# Milestone Report

# for Upland Source Control at the Portland Harbor Superfund Site

March 2006

Prepared by the Oregon Department of Environmental Quality as required by the 2005 Portland Harbor Joint Source Control Strategy



This document is posted on DEQ's web page at <a href="http://www.deq.state.or.us/nwr/PortlandHarbor/JSCS.htm">http://www.deq.state.or.us/nwr/PortlandHarbor/JSCS.htm</a>.



# Table of Contents

1.0	Introduction	l l
2.0	Identifying Potential Sources of Contamination in Portland Harbor	3
3.0	Evaluating Potential Sources of Contamination to the River	5
4.0	Taking Measures to Control Sources and Making Source Control Decisions 4.1 Types of source control measures	7
	4.2 DEQ coordination with EPA and partners on source control decisions	
5.0	Status of Ongoing and Completed Source Control Measures	9
6.0	Issues Encountered in Source Control Work	9
7.0	Summary	1.]
8.0	Obtaining Additional Information on Upland Source Control Work	12
9.0	Information about Table 4: Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor  9.1 Acronyms and abbreviations.  9.2 Contact information for DEQ Project Managers.	16
Lis	st of Tables	
Tab	ole 1. Results of 1999 DEQ Project Manager evaluation of the potential relationship between in-water sediment contamination and upland sites already in the process of cleanup (from 1999 data)	
Tab	ole 2. Sites identified by DEQ in 1999 as part of the Portland Harbor Site Discovery Process (from 1999 data)	
Tab	ole 3. New Sites in Portland Harbor identified through the Site Discovery Proces (2000 to present)	S
Tab	ole 4. Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor	

#### 1.0 Introduction

On December 1, 2000, a section of the lower Willamette River within the City of Portland, the Portland Harbor, was added to the Superfund National Priority List (NPL). In February 2001, the Oregon Department of Environmental Quality (DEQ), United States Environmental Protection Agency (EPA), and other governmental parties signed a Memorandum of Understanding (MOU) that provided a framework for cooperation in the investigation and cleanup of the Portland Harbor Superfund Site to optimize federal, state, tribal and trustee expertise and available resources.

Under the 2001 MOU, EPA was designated as the lead agency for investigating and cleaning up"in-water" contamination in the Harbor, or contamination in the river water and underlying
sediment, using federal Superfund authorities. DEQ, using state cleanup authority, was
designated as the lead agency for identifying and controlling "upland" sources of contamination,
or those sources of pollution adjacent to or near the river that may be contaminating river water
or sediments. To coordinate in-water cleanup and upland source control work, the MOU
specifies that DEQ and EPA will jointly develop a source control strategy that defines a process
for identifying and controlling potential sources of contamination threatening the river.

DEQ and EPA finalized the Portland Harbor Joint Source Control Strategy (JSCS) in December 2005<sup>2</sup>. The overarching goal of the JSCS is to identify, evaluate and control sources of contamination that may affect the Willamette River in a manner that is consistent with the objectives and schedule for the Portland Harbor remedial investigation and feasibility study (RI/FS). Timely upland source control is necessary to allow cleanup of the river to proceed without risk of significant recontamination.

The JSCS requires DEQ to prepare a Milestone Report on a quarterly basis that summarizes the status of DEQ's upland source control work. This is the first Milestone Report. Milestone Reports are submitted to EPA, and provide the basis for quarterly meetings with EPA and our government partners to discuss site prioritization and source control progress. These reports also serve as documentation of progress on river-wide source control within Portland Harbor.

#### 1.1 Organization of the Milestone Report

The Milestone Report is organized as follows.

Section 2.0: Identifying Potential Sources of Contamination in Portland Harbor – This
section provides the history of DEQ's work to identify potential sources of contamination to
the Willamette River in Portland Harbor, including site discovery and site assessment

<sup>&</sup>lt;sup>1</sup> The signatory partners to the MOU include the EPA, DEQ, Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of Siletz Indians, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, Nez Perce Tribe, National Oceanic and Atmospheric Administration, Oregon Department of Fish and Wildlife, and U.S. Department of the Interior.

<sup>&</sup>lt;sup>2</sup> The JSCS is available on DEQ's web site at <a href="http://www.deq.state.or.us/nwr/PortlandHarbor/ph.htm">http://www.deq.state.or.us/nwr/PortlandHarbor/ph.htm</a>; click "Joint Source Control Strategy" on the left side bar.

activities before and after the December 2000 Superfund listing. Tables 1, 2 and 3 provide additional information on site discovery and site assessment work.

- Section 3.0: Evaluating Potential Sources of Contamination to the River This section describes DEQ's source control evaluation work for all confirmed or suspected upland sources of contamination to Portland Harbor, as summarized in Table 4.
- Section 4.0: Taking Measures to Control Sources and Making Source Control Decisions –
  This section describes the source control measures used at upland sites in Portland Harbor
  and the process for making source control decisions, including coordination with EPA and
  our government partners, and public involvement opportunities. Source control measures and
  decisions are summarized in Table 4.
- Section 5.0: Status of Ongoing and Completed Source Control Measures This section describes the information presented in Table 4 that summarizes the status of ongoing and completed source control measures.
- Section 6.0: Issues Encountered in Source Control Work This section describes issues
  affecting DEQ's ability to conduct source control work and proposes ways to resolve issues
  as well as a desired timeframe for resolution.
- Section 7.0: Summary This section summarizes the overall status of source control work in Portland Harbor, highlighting accomplishments, key issues and next steps for moving forward.
- Section 8.0: Obtaining Additional Information on Upland Source Control Work This section indicates where additional information can be found on the status of source control work at upland sites in Portland Harbor.
- Section 9.0: Information on Table 4, Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor: This section provides helpful information for interpreting Table 4, including definition of key terms and acronyms used.

#### 2.0 Identifying Potential Sources of Contamination in Portland Harbor

In 1997, DEQ asked EPA for assistance in identifying potential sources of elevated chemical concentrations detected at sites within Portland Harbor. The result of this request was a sediment investigation that covered six miles of Portland Harbor (now known as the Initial Study Area, or ISA<sup>3</sup>) considered likely to have the highest chemical concentrations based on the presence of a number of industrial sources. The findings of this study, documented in EPA's 1998 "Portland Harbor Sediment Investigation Report," suggested that there were several areas of elevated chemical concentrations in river sediments within the Harbor. Because of these findings, DEQ initiated a proactive site discovery process that included evaluation of available information on the activities and conditions in Portland Harbor to identify likely sources of upland contamination threatening the river.

<sup>&</sup>lt;sup>3</sup> The ISA was a six mile stretch of the lower Willamette River, extending from the southern tip of Sauvie Island upstream to Swan Island.

EPA's 1998 "Portland Harbor Sediment Investigation Report" found that most of the areas of elevated chemical concentrations in river sediments were near known sources of upland pollution. There were some sediment areas with high chemical concentrations, however, that were not near known or identified upland sources. In addition, it appeared that contaminant migration and resuspension were limited within the Harbor, suggesting the existence of additional unidentified upland sources. These findings formed the basis of DEQ's site discovery efforts in Portland Harbor.

#### 2.1 DEQ Site Discovery and Site Assessment work prior to the December 2000 listing

In 1998 and 1999, DEQ followed eight initial steps in searching for additional sources of upland contamination in Portland Harbor (site discovery) and assessing potential sources to determine the need for source control actions (site assessment). These eight steps are described in detail in DEQ's June 1999 "Portland Harbor Sediment Management Plan" and are summarized below.

<u>Step 1: Identifying contaminants of interest</u> – DEQ used the "Portland Harbor Sediment Investigation Report" results to identify a representative list of contaminants of interest (COI) – chemicals present in the Harbor at levels that could threaten human health and the environment. The COIs included metals, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), chlorinated pesticides, chlorinated herbicides, dioxin and tributyl tin (TBT).

Step 2: Identifying elevated concentrations – DEQ developed a method for determining what concentrations constituted "elevated" COI levels within the Harbor. Because there was no clear definition of background contaminant concentrations or ambient conditions in the Portland Harbor area, sediment data from the Harbor were evaluated with a graphical method previously used by the U.S. Geological Survey Water Resources Division to define apparent elevated contaminant levels. "Baseline" contaminant concentrations were developed for Portland Harbor sediment from this graphical evaluation method.

Step 3: Identifying locations where baseline concentrations are exceeded – Maps were prepared to show the locations of samples with elevated concentrations of COIs throughout the Harbor. DEQ project managers working on active cleanup sites in the Harbor reviewed these maps and provided feedback on whether the elevated concentrations found in sediment appeared to be related to sources on sites that DEQ was actively working to investigate or clean up, or whether the maps indicated the potential presence of another source. Table 1 provides a list of sites in Portland Harbor that DEQ was actively working on in 1999, along with a summary of DEQ project managers' evaluation of the potential relationship between in-water sediment COI levels and contamination at these active cleanup sites.

<u>Step 4: Identifying potential sources</u> – DEQ then began to identify other potential sources of contamination in the general vicinity of Portland Harbor. These site discovery efforts targeted areas of elevated sediment contamination either unrelated to sites that DEQ was already investigating or cleaning up, or areas adjacent to active cleanup sites for which site data suggested the potential presence of another source.

<sup>&</sup>lt;sup>4</sup> The method was described by Frank Rinella, a Water Quality specialist with USGS Water Resources Division, at a Contaminated Sediments Conference sponsored by The Environmental Law Education Center, January 30, 1998.

Site discovery work included researching information on each area of elevated COIs to identify potential upland sources for the sediment contamination, analyzing area and site drainage patterns, evaluating historic activities and conducting field reconnaissance work. Upland properties that were found to be associated with the sediment contamination were then prioritized based on sediment contamination levels, the number of COIs present in the sediment, the toxicity of the contaminant to people and the environment (using EPA's water quality ranking) and professional judgment.

Step 5: Requesting information from property owners – In January 1999, DEQ sent letters to all owners of property (approximately 90 parties) located within 1,500 feet of Portland Harbor to provide information on DEQ's site discovery efforts and to request additional information. These "potentially responsible parties" were asked to provide historic and current information about activities at the site to assist DEQ's site discovery process. Follow-up letters and questionnaires were sent to a subset of the property owners, and when appropriate, to site lessees that were potentially responsible for sources of sediment contamination in the Harbor. Site discovery questionnaires were sent to the property owners listed in Table 2.

Step 6: Documenting likely sources of contamination — Potential likely sources of contamination were identified for each of the sediment areas that had COI contamination above baseline levels, and available records for these sources were documented. Forty-four likely potential sources were identified through the process described above (Table 2). A file was then created in DEQ's Environmental Cleanup Site Information (ECSI) database for each potential source to complete the site discovery process for the Portland Harbor area. DEQ then initiated the site assessment process, the next phase of site evaluation.

Step 7: Site screening and prioritization - In the first phase of site assessment, sediment samples were correlated with presumed upland sources (listed in Table 2) for the purposes of preliminary site screening. The highest priority sources were those associated with sediment contaminant concentrations reflecting the top five percentile of chemical concentrations for a particular chemical. Priority was given to those sites where associated sediment concentrations were more than three times the baseline level or where baseline concentrations were exceeded for several different contaminants. Consideration was also given to the toxicity of the chemicals found to be elevated using EPA's water quality rankings. Lower priority was given to upland sites associated with only a small subset of COIs that exceed baseline levels and where the magnitude of the exceedance was less than a factor of three for all constituents. Professional judgment was also used to integrate other factors pertinent to the priority for follow-up. These factors included: evidence of an on-going release, observations made during field reconnaissance, concentration elevations that suggested a release but were below baseline levels, historic information that suggested a release not associated with a particular baseline exceedance, the quality of information linking a potential source to the elevated concentrations, the presence of other metals not considered of primary concern (e.g., iron, magnesium, thallium, cobalt, vanadium, and titanium), and an evaluation of the individual compounds within some of the other contaminant groups (e.g., individual PAHs or phthalates).

Step 8: Strategy recommendations – DEQ then developed recommendations for further investigation and/or cleanup for a number of high priority sources. These "strategy recommendations" summarized available information on the potential sources and potential threats posed by the sources, and recommended investigation/cleanup actions and priority levels for the work. All available information on file and any information received through questionnaires was reviewed in detail to develop the recommendations. Where historical site data was lacking, a review of Sanborne Insurance Maps was often completed.

DEQ's initial effort of completing strategy recommendations for all likely Portland Harbor sources was curtailed with EPA's December 2000 listing of the Harbor.

#### 2.2 DEQ Site Discovery and Site Assessment work following the December 2000 listing

At the time of the Portland Harbor listing (December 2000), DEQ was working to investigate and/or clean up 16 sites in the Portland Harbor area (listed in Table 1). By the time of the listing, DEQ had identified an additional 44 upland sites through the site discovery process were potential or confirmed sources of contamination to the river in the Harbor (listed in Table 2).

DEQ's site discovery and site assessment efforts continued after EPA's December 2000 listing of Portland Harbor, and for the most part, these efforts followed the same process used prior to the listing. DEQ's work continued to focus on facilities along the banks of the Willamette River within the bounds of the 1997 Portland Harbor sediment investigation.

As the Portland Harbor study area began to grow beyond the Initial Study Area, DEQ's site discovery and site assessment efforts expanded with it. Recently, much of DEQ's site discovery and site assessment work has focused on identifying potential sources of contamination threatening the river through stormwater that is piped to the river from surrounding upland areas. DEQ has worked closely with the City of Portland to identify upland sources contributing contamination via the City's municipal stormwater system. Since the Portland Harbor Superfund listing in 2000, DEQ has identified an additional 19 sites adjacent to or near Portland Harbor through the site discovery process (Table 3).

#### 3.0 Evaluating Potential Sources of Contamination to the River

DEQ is now investigating or directing source control work at nearly 60 upland sites in Portland Harbor. Preliminary investigation activities at these sites are designed to determine whether the site is a potential or ongoing source of contamination to the river. These investigations, or "source control evaluations," consider all potential, current and historic contaminant sources and pathways for the contaminants to migrate to the river. Potential pathways include:

 Direct discharges – Pollutants from commercial, industrial, private or municipal outfalls are being discharged directly to the Portland Harbor Superfund Site. Many of these discharges are permitted under the Clean Water Act National Pollutant Discharge Elimination System (NPDES). Permitted discharges include industrial wastes, storm water runoff, and combined sewer overflows (CSOs)<sup>5</sup>.

- Groundwater Contaminated groundwater may enter the river directly via discharge through sediments, bank seeps, or it may infiltrate into storm drains/pipes, ditches or creeks that discharge to the river. Contaminant migration may occur as non-aqueous phase liquids (NAPLs) or as chemicals dissolved in the groundwater itself.
- Stormwater Contaminants may be carried to the river by water that runs off a site into storm drains after it rains, delivered to the river by stormwater pipes (including permitted and unpermitted stormwater discharges).
- Overland transport/sheet flow The uncontrolled flow of water from a site to the river and the transport of other materials from a site may deliver contaminants to the river.
- Bank erosion/leaching River bank soil, contaminated fill, waste piles, landfills and surface impoundments may release contaminants directly to the river through erosion, via soil erosion to storm water, or by leaching to groundwater.
- Overwater activities Contaminants from overwater activities (e.g., sandblasting, painting, unloading, maintenance, repair and operations) at riverside docks, wharves, or piers; discharges from vessels (e.g., gray, bulge, ballast waters); full releases; and spills may affect the river.

These potential contaminant migration pathways are evaluated for each site, and sites that are identified as current or potential sources of pollution to the river are characterized and prioritized. Source control measures are then initiated, or further evaluation of source control alternatives is conducted to determine whether source control measures are required.

Table 4 provides a summary of confirmed and suspected upland sources of contamination to the river that DEQ is either actively working on or has finished source control work on by issuing a final source control decision. Table 4 also provides the basis for the determination that a site is a source of contamination to the river, the status of and schedule for source control evaluation, and the priority of the site for source control. The table includes the priority of each contaminant migration pathway for each site, as well as the overall priority of the site based on the pathway priorities.

High priority sites are identified in the table based on existing site information, and subsequent Milestone Reports will identify any new high priority sites as new information becomes available. Source control is expected to move forward at high priority sites without delay.

#### 4.0 Taking Measures to Control Sources and Making Source Control Decisions

DEQ determines the need for source control measures at each upland site, in consultation with EPA, based on the completeness of contaminant migration pathways, exceedances of Screening

<sup>&</sup>lt;sup>5</sup> CSO events are untreated discharges of combined storm water, sanitary sewage from residential, commercial, and industrial sources that overflow from the sewer system into the river during heavy rainfall periods when the amount of storm water and sewage exceeds the capacity of the collection system.

Level Values (SLVs), and other factors as appropriate. See p. 3-1 through 3-6 of the JSCS for more information about SVLs, and p. 4-1 through 4-8 of the JSCS for more information about the source control decision process.

#### 4.1 Types of source control measures

Upland source control is an iterative process, where early steps may be revisited and conclusions refined by information gathered later in the process. A combination of tools may be used to control a source, including but not limited to the following.

- Technical assistance Technical assistance, often provided during inspections, provides technical information designed to help individual businesses bring their facilities into compliance with environmental regulations. DEQ's Hazardous Waste Program is actively providing technical assistance to facilities within the Portland Harbor Superfund Site area.
- Cleaning up contaminated upland areas Cleanup work addresses contaminated soil, groundwater, stormwater and other sources and focuses on reducing or eliminating contaminant migration to the river. Common source control measures include removing highly contaminated soil areas, stabilizing or capping contaminated bank areas, treating or containing contaminated groundwater, and extracting contaminated sediment from storm sewer systems. Source control measures vary from site to site.
- Source control of active discharges Tools to control active discharges include best
  management practices, industrial process changes, pollution prevention practices, and
  technology-based effluent controls. Compliance is achieved voluntarily or through
  administrative actions, including permits or enforcement.
- Source control of storm water Storm water source control is complex because storm drain systems capture discharges from many different sources (e.g., land use activities, runoff from contaminated sites, and infiltration of contaminated groundwater into the storm drain system). It is also complex because storm water regulation may involve federal, state and local agencies. Because of this complexity, all of the tools described above are useful for storm water source control and will be used as appropriate.
- Administrative actions and enforcement Administrative actions include licenses, permits, deed restrictions, requirements for site development plans, and enforcement actions, which may be necessary when administrative actions are violated. Agencies rarely take enforcement actions without first conducting an inspection and documenting findings, requested changes, warnings and offers of technical assistance. When enforcement actions are warranted, they are usually taken in escalating order, starting with notices of violation, moving to enforcement or compliance orders requiring specific changes by a set date, and ending in monetary penalties. Formal cleanup actions performed under an order or decree use oversight and enforcement to ensure that appropriate actions are taken in a timely manner.

Table 4 summarizes source control decisions conducted at upland sites, the basis for the determination that upland source control measures are necessary, a summary of the selected source control measure(s), and a schedule for implementing the source control measure(s).

#### 4.2 DEQ coordination with EPA and partners on source control decisions

As the lead agency for identifying and controlling sources of upland contamination threatening the river in Portland Harbor, DEQ coordinates with EPA and our government partners on source control work. This includes documenting, tracking and coordinating source control efforts as described in Sections 2.5 and 7 of the JSCS.

DEQ will provide EPA and our partners with an opportunity to review source control decisions prior to being finalized. These decisions typically fall into the following three categories.

- DEQ has determined that a site is not a current or future source of contaminants to Portland Harbor and that no source control measures are required.
- DEO has selected the source control measures for a site.
- DEQ has concluded that source control at a site is complete, or in the case of systems that require operation and maintenance (e.g., hydraulic containment), that the source control action is effective.

DEQ will inform EPA and our partners of pending source control decisions and the schedule for review, and will provide copies of source control decision documentation to EPA and partners upon request. EPA and partners will have 30 days to provide comments to DEQ on source control decisions.

In addition to this regular review and comment process, some upland sites in Portland Harbor may warrant closer coordination between DEQ, EPA and our partners for source control (e.g., the Gasco site and potential source control measures for the chlorinated solvent groundwater plume at the Siltronic site). In these instances, DEQ and EPA source control coordinators will develop a project-specific coordination strategy.

#### 4.3 Public involvement in source control decisions

DEQ Cleanup Program statutes and rules require that a public notice and comment opportunity be provided prior to DEQ's selection of a final site cleanup remedy and before DEQ determines that the cleanup is complete. For upland Portland Harbor cleanup projects, this means that DEQ issues a public notice and seeks public comments on the recommended final site cleanup strategy. Once public input is considered, DEQ's final decision is documented in a Record of Decision (ROD) for the site. For most sites, the upland DEQ ROD includes elements that address both source control for Portland Harbor and cleanup actions specific to areas of upland contamination that are not related to pollution in the Harbor.

Many of the source control measures implemented at upland sites are conducted prior to the selection of the final upland site remedy. While public notice and comment is not required for these "interim" remedial actions under DEQ statutes and rules, DEQ typically does issue a public notice and seek public comments when the action is likely to be a substantive piece of the final site remedy, or as the DEQ project manager determines is appropriate.

DEQ does not typically seek public comments for small-scale interim source control measures and time critical actions. Project managers will, however, issue notices as appropriate to let the public know that the activity is being conducted.

#### 5.0 Status of Ongoing and Completed Source Control Measures

Table 4 summarizes the status of ongoing source control measures (SCMs), including SCM activities completed to date, proposed SCM activities, and a target schedule for completion. To the extent practicable, DEQ has collected information and/or made estimates of the mass or volume of contaminants removed, contained, treated or otherwise controlled, to help demonstrate the progress of source control activities. This initial Milestone Report includes only limited information on the mass or volume of contaminants controlled; subsequent Milestone Reports will include more information.

Table 4 also summarizes completed SCMs and provides the date that the SCM was completed, the date of EPA review and comment, and any operation and maintenance requirements associated with the SCM.

#### 6.0 Issues Encountered in Source Control Work

This section summarizes issues affecting DEQ's ability to make source control decisions or completeness of determinations for any step of the source control process. This section also presents DEQ's proposed ways to resolve the issues and a desired timeframe for resolution. Six issues have been identified in this initial Milestone Report.

#### <u>Issue 1: Moving certain projects through the source control process</u>

For a number of different reasons, certain DEQ Portland Harbor cleanup projects are not proceeding through the source control process at an acceptable pace. Source control activities at the sites need to be accelerated in order to identify, evaluate and control upland contaminant sources before the Portland Harbor Record of Decision.

To resolve this issue, DEQ proposes to first identify these sites and then accelerate their schedules for source control work. Sites that need to be accelerated include:

- Premier Edible Oil Sc [Time Oil naighbor finger printing] Travisition zone water sampling
- · Crawford Street block Sand in Bank [earlyer nemoval done inbank]
- Georgia Pacific Linnton , \( \square\)
- · Schnitzer Burgard need more oversight by DEQ
- · MarCom South pankrup => new owher RI/FS work plan in place
- · GS Roofing unpermitted indust, Landfill

DEQ will report on efforts to accelerate source control work at these sites in the next Milestone Report (June 2006).

Issue 2: Completing source control at the Gasco site

NW Natural's Gasco site is a high priority site for upland source control. The distribution and magnitude of upland contamination at the Gasco site are extensive and very significant. DEQ has directed NW Natural to collect data to support the selection, design, installation and operation of source control measures, rather than conducting further source control evaluation. NW Natural is moving forward with this data collection work, but with the amount of work necessary, DEQ needs to press NW Natural with an aggressive schedule.

DEQ recently assigned Project Manager Heidi Blischke to direct source control work at the Gasco site. Heidi has the experience and the time to manage the project on an aggressive schedule. DEQ is also currently negotiating an amended agreement with NW Natural that will increase DEQ's ability to require compliance with an aggressive schedule.

#### Issue 3: DEO staff resource limitations

Limited staff resources are affecting DEQ's ability to conduct and complete source control work in Portland Harbor. The size of DEQ's Cleanup Program was recently reduced due to budget constraints, and with that reduction, DEQ lost several staff working on Portland Harbor. It is unlikely that DEQ's Portland Harbor staffing levels will be increased in the near future.

DEQ is continually looking at staff work load and developing priorities to address the most important work. DEQ will continue Portland Harbor source control efforts focusing on the most significant and potentially significant upland sources, and explore opportunities to increase staffing levels when possible.

#### Issue 4: Storm water investigations and site discovery efforts

The City of Portland is investigating contamination and source control options (i.e., conducting a remedial investigation and feasibility study) for the City's municipal storm water conveyance system in Portland Harbor under DEQ oversight. The purpose of the work is to determine whether discharges from the City's outfalls are a significant source of Portland Harbor sediment contamination. DEQ is working closely with the City to identify upland sites that may be contributing contamination to the storm water outfalls. A number of new upland sites may be identified in this process, and limited staff resources may affect DEQ's ability to evaluate these new sites.

DEQ will continue to prioritize source control work based on the most significant and potentially significant sources, including upland sites contributing storm water to the City's conveyance system.

#### Issue 5: Storm water evaluation and control

Storm water has been the most challenging Portland Harbor contaminant migration pathway for DEQ to evaluate and control because of the many sources contributing to storm water systems, the temporal variation in storm water and the complexity of storm water regulation. For these reasons, storm water evaluation and control has generally lagged behind other contaminant migration pathways (i.e., soil and groundwater pathways) in Portland Harbor source control efforts.

DEQ sees resolution of this issue through a number of elements. First, with the December 2005 finalization of the JSCS (and JSCS Appendix D, "Framework for Portland Harbor Storm Water Screening Evaluations"), DEQ project managers now have tools to better evaluate Portland Harbor storm water. Second, DEQ recently appointed Karen Tarnow as the Portland Harbor Storm Water Coordinator. This City of Portland, Bureau of Environmental Services-funded position was created to provide programmatic regulatory and site-specific assistance to sites that discharge storm water to the Harbor. Karen will assist DEQ project managers with Portland Harbor storm water issues and help advance the storm water evaluation and control process. Third, DEQ's Portland Harbor Manager and Project Coordinators will work with project managers to address the storm water pathway in a timely manner.

#### Issue 6: Developing a long-term storm water solution

A long-term solution is needed to control contaminants in storm water discharges to Portland Harbor to ensure that ongoing storm water discharges do not recontaminate in-water cleanup remedies.

Resolving this issue will take time. In 2005, DEQ formed a Portland Harbor Storm Water work group composed of staff and managers from DEQ's Cleanup and Water Quality Programs. The purpose of the work group is to address the issue – to develop a regulatory method of ensuring that storm water will not recontaminate sediments after the remedy for Portland Harbor has been implemented. The work group will continue to meet and attempt to develop a long-term storm water solution for Portland Harbor.

#### 7.0 Summary

DEQ is making significant progress in controlling sources of contamination to the lower Willamette River in Portland Harbor, and is coordinating resources of its Cleanup, Hazardous and Solid Waste, Water Quality and Spills Programs to achieve upland source control objectives by the expected time of the Portland Harbor Record of Decision. To date, DEQ has identified approximately 80 upland sites that may be potential sources of contaminants in Portland Harbor, and these sites have been prioritized for additional investigation or source control.

Currently, DEQ is actively overseeing investigation and source control work at over 60 upland sites (summarized in Table 4). Of these 60 sites:

- DEQ has determined that 16 sites are considered to be a high priority for source control. Seven of these high priority sites have active or operating source control measures in place.
- The priority level for 33 sites has not yet been determined. Source control evaluations, which will determine the priority for source control, are scheduled to be complete for 25 of these 33 sites in 2006.
- DEQ has determined that source control work is complete, through closing and/or issuing "No Further Action" determinations, at 14 upland sites (see shaded sites in Table 4).

In addition, the DEQ Toxic Use/Waste Reduction Assistance Program (TU/WRAP) is providing technical assistance to facilities in the Portland Harbor area that may be discharging contaminants to the river via the City's storm sewer system, encouraging these facilities to reduce their hazardous waste use and pollution releases. DEQ TU/WRAP staff worked with the

City of Portland to identify priority areas and facilities, and conducted over 70 technical assistance visits and facility inspections within City outfall basins M-1, 18, 24 and 52. DEQ and the City are currently evaluating the next City outfall basins to focus on in technical assistance and inspection efforts.

DEQ will submit a Milestone Report to EPA each quarter, and update Table 4 with the current status of source control work at all upland sites. For more information about the Milestone Report or DEQ's source control work generally, please contact Jim Anderson, DEQ Portland Harbor Project Manager, at (503) 229-6825, or anderson.jim@deq.state.or.us.

#### 8.0 Obtaining Additional Information on Upland Source Control Work

For more information on DEQ's source control work at any of the sites listed in Table 4, see DEQ's Portland Harbor web page (<a href="http://www.deq.state.or.us/nwr/PortlandHarbor/ph.htm">http://www.deq.state.or.us/nwr/PortlandHarbor/ph.htm</a>) and click on "Map of Sites" on the left side bar. This link provides a map showing all Portland Harbor upland sites and summary reports of the status of source control work. Just open the map and click on the site you are interested in to connect to DEQ's Environmental Cleanup Site Information (ESCI) database, which houses current information on work at each site.

Alternatively, contact the DEQ project manager (PM) that is leading work on the site you are interested in. Contact information for each DEQ PM is listed on the last page of this report.

For more information on the status work on the Portland Harbor Superfund Site, see EPA's Portland Harbor web page (http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor).

# 9.0 Information about Table 4: Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

The purpose of Table 4, entitled Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor, is to track and share information on the status of DEQ's efforts to evaluate and control sources of pollution to the Willamette River in Portland Harbor. The table provides information on each upland site that DEQ is working on in the Harbor, including the status of evaluations to determine whether source control is needed, the progress of source control measures, and the status of source control decisions and EPA review. Below is some helpful information for interpreting the table, including definitions for key terms and acronyms used.

#### Site Information and Project Status

The first columns of Table 4 provide basic background information on each site, including:

- the name of the site,
- the site's reference number for DEQ's Environmental Cleanup Site Information (ESCI) database.
- the location of the site (river mile and address),
- the DEQ project manager (PM) that is leading source control work,
- the type of agreement DEQ is using to direct cleanup activities at the site (i.e., Intergovernmental Agreement, Portland Harbor Agreement, Unilateral Order, etc.), and
- the status of work occurring at the site (i.e., Preliminary Assessment, Remedial Investigation, completed Source Control Decision, Remedial Design/Remedial Action, etc.).

#### **Source Control Evaluation**

The Source Control Evaluation (SCE) columns in Table 4 provide information on the status of DEQ's work to evaluate the need for source control measures, including the status of SCE for each potential pathway, the schedule for completing SCE, the basis for determining whether source control measures are needed, and the status of EPA review.

#### Potential pathways

Six standard pathways represent the major potential pathways that contaminants could follow to reach the river from an upland site. These pathways include:

- overland transport/sheet flow the uncontrolled flow of water and other material to the river from a site
- back erosion erosion of material within the sloping bank areas of the site to the river
- groundwater groundwater plumes or discharges to the river via seeps or through preferential pathways
- stormwater stormwater discharges to the river that originate from a pipe or stormwater system, including unpermitted stormwater discharges and discharges under a DEQ general stormwater permit
- overwater activities the storage or use of hazardous substances over the water (i.e., storage tanks on docks, permanent work activities conducted over water), that if released would be a

- potential current or future source of contamination to the river; pipelines and other conveyance systems are not considered in this category, releases from these types of systems are reported to the Oregon Emergency Response System (OERS) system for clean up
- other may include permitted wastewater discharges, individually permitted stormwater discharges, air deposition or other pathways

Each of these standard pathways appears for each site in Table 4 to track SCE work on a pathway-specific basis.

#### Use of "N/A" for the pathways

N/A is used in Table 4 to indicate that the particular pathway does not exist at the site. For example, for an upland site that is set back from the river (i.e., not adjacent to the river's edge) N/A would indicate that the overland transport/sheet flow, overwater activities, and bank erosion pathways do not exist at the site. For a site that is adjacent to the river, but where a concrete seawall lines the river bank, N/A would indicate that the pathway bank erosion does not exist at the site.

#### Priority levels for each pathway and site

Each pathway evaluated at each site is given a priority level for source control upon completion of the SCE, or when adequate information exists to determine the pathway's priority. Pathways are prioritized based on their ability to carry contaminants from upland areas to the river at concentrations that exceed Screening Level Values (SLVs) listed in the JSCS (see p. 4-3 through 4-6 of the JSCS for more information on the prioritization process, and JSCS Table 3.1 for SLVs). Each site is then given a priority level based on the highest priority of the pathways. For example, if a site has two *low* priority pathways and one *high* priority pathway, the site is determined to be a *high* priority for source control. Definitions for *high*, *medium* and *low* priority determinations follow.

- High High priority pathways and sites are those where a complete contaminant migration pathway exists and the upland source is significantly impacting the river or poses a significant and imminent threat to the river based on initial evaluation of key source control prioritization factors (listed on p. 4-3 of the JSCS). A primary consideration is that one or more media (soil, water or air) significantly exceed applicable SLVs at the point of discharge to the river (e.g., water at the end of a discharge pipe, or soil or material at the riverbank) or the most reliable and cost-effective data point (e.g., groundwater measured at the shoreline), or where a bioaccumulative chemical is detected at concentrations significantly above the SLV. In addition, if an upland source is violating DEQ narrative water quality criteria for the Willamette River, the site may be considered a high priority. High priority sites are expected to move forward with aggressive source control measures without delay or be subject to enforcement action.
- Medium Medium priority pathways and sites are those where a complete contaminant migration pathway exists and the upland source is impacting the river or poses a significant and/or imminent threat to the river based on an initial evaluation of key source control prioritization factors (listed on p. 4-3 of the JSCS). A primary consideration is that one or more media exceed applicable SLVs, but not significantly, at the point of discharge to the river, or where a bioaccumulative chemical is detected at concentrations above the SLV.

Although exceedance of SLVs does not necessarily indicate that a site poses a significant and/or imminent threat or needs to immediately implement source control measures, it does indicate that the site may pose a threat to human health or the environment and that additional evaluation may be needed to determine if source control measures are required to prevent, minimize or mitigate the migration of hazardous substances to the river. If the site exceeds one or more SLVs, the need for further characterization or for implementation of source control measures will be based on a site-specific weight-of-evidence determination. Medium priority sites are expected to perform a weight-of-evidence evaluation to determine if source control measures are required (see p. 4-5 of the JSCS for more information on the weight-of-evidence evaluation).

- Low Low priority pathways and sites are those where upland data indicate, based on an initial evaluation of key source control prioritization factors (listed on p. 4-3 JSCS), that the site likely poses a low threat to the river (e.g., concentrations are near or below SLVs) or where DEQ, in consultation with EPA, may issue an upland "No Further Action" (NFA) determination or lower the State's priority of the site for further upland investigation or remedial action under DEQ's cleanup authority. Source control measures will not be required at low priority sites unless determined necessary by the results of the Portland Harbor RIFS or ROD.
- p High DEQ's preliminary determination is that this is likely a high priority pathway or site based on available information. A final determination of pathway or site priority will be made upon completion of the SCE.
- p Med DEQ's preliminary determination is that this is likely a medium priority pathway or site based on available information. A final determination of pathway or site priority will be made upon completion of the SCE.
- p Low DEQ's preliminary determination is that this is likely a low priority pathway or site based on available information. A final determination of pathway or site priority will be made upon completion of the SCE.

#### Source Control Decisions and Status of Source Control Measures

The Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs) columns in Table 4 provide information on actions taken or needed to control sources of contamination to the river, including the selected SCMs for each pathway, status of SCM implementation, status of EPA review, and ongoing operation and maintenance requirements.

For many sites listed in Table 4, boxes for information on SCDs and SCMs will be blank because source control work at those sites is still in the evaluation (SCE) phase. Other sites may be in the process of implementing SCMs, and still others may have completed all source control work. For those sites that have completed upland source control and SCMs have been determined to be effective, shading indicates that work is finished at this point in time. Upon completion of the Portland Harbor in-water RIFS, however, DEQ will reevaluate all source control work to ensure that it adequate controlled contaminants to the final cleanup levels developed for the Harbor.

#### 9.1 Acronyms and abbreviations

Agr Agreement

Administrative Order on Consent AOC

Air sparge/soil vapor extraction - a Source Control Measure used to remove AS/SVE

volatile contaminants from groundwater; often combined with treatment measures

**AST** Above ground Storage Tank **AWQC** Ambient Water Quality Criteria **BMPs Best Management Practices BRA** Baseline Risk Assessment

CERCLA Comprehensive Environmental Response, Compensation and Liability Act

COI Contaminant of Interest – chemicals present in Portland Harbor at levels that

could threaten human health and the environment Oregon Department of Environmental Quality

**DEQ ECSI** DEQ's Environmental Cleanup Site Information database

**EPA Environmental Protection Agency** 

FS Feasibility Study – a phase of the cleanup process; evaluating cleanup alternatives

after the Remedial Investigation has been completed

GW Groundwater

**ICP** Independent Cleanup Pathway Inter-Governmental Agreement **IGA** Interim Remedial Action Measure IRAM

Halogenated Volatile Organic Compounds **HVOCs** 

Joint Source Control Strategy – issued by DEQ and EPA in December 2005<sup>6</sup> **JSCS** 

Low density Non-Aqueous Phase Liquid LNAPL

Not Applicable – used in Table 4 to indicate that the particular pathway does not N/A

exist at the site

**NAPL** Non-Aqueous Phase Liquid

N&E Nature and extent of the contamination at the site

**NFA** No Further Action – a DEQ notice to a Responsible Party declaring that no further

cleanup action is needed at the site

OF Outfall

p&t Pump & Treat system – a Source Control Measure used to remove or contain and

treat contaminated groundwater

PA Preliminary Assessment – an early assessment stage of the cleanup process

**PCB** Polychlorinated Biphenyls

PH Portland Harbor

PH Agr Portland Harbor Agreement – a formal agreement to conduct the remedial

investigation and source control work

Portland Harbor Letter Agreement – an initial agreement to conduct limited PH Ltr Agr

investigation and cleanup activities and cover DEQ's oversight costs

PM DEO Project Manager leading cleanup work at the site

**PPA** Prospective Purchaser Agreement – a tool for negotiating and agreeing upon

potential liability for prospective purchasers of sites

<sup>&</sup>lt;sup>6</sup> The JSCS is available on DEQ's web site at <a href="http://www.deq.state.or.us/nwr/PortlandHarbor/ph.htm">http://www.deq.state.or.us/nwr/PortlandHarbor/ph.htm</a>; click "Joint Source Control Strategy" on the left side bar.

PRP	Potentially Responsible Party
RD/RA	Remedial Design/Remedial Action – a phase of the cleanup process that occurs
·	after the Record of Decision; designing and implementing the cleanup action
RI	Remedial Investigation – a phase of the cleanup process; investigating the nature
	and extent of contamination and understanding the potential risks posed by the
	contaminants to human health and the environment
RI/FS	Remedial Investigation/Feasibility Study
RP	Responsible Party
SC	Source Control
SCD	Source Control Decision
SCE	Source Control Evaluation
·SCM	Source Control Measure
SLV	Screening Level Value – a contaminant-specific level established in the JSCS (see
	JSCS Table 3.1) that is used to screen upland pathways and sites to identify
	potential threats to human health and the environment.
SOW	Scope of Work
SVE	Soil Vapor Extraction – a Source Control Measure used to remove volatile
	contaminants from subsurface soils; often combined with soil vapor treatment
TCA	Trichloroethane
UIC .	Underground Injection Control system
UST	Underground Storage Tank
VCP	Voluntary Cleanup Program
VOCs	Volatile Organic Compounds
WO	Waiting on
XPA	Expanded Preliminary Assessment – an early assessment stage of the cleanup
	process

#### 9.2 Contact information for DEQ Project Managers

Jim Anderson	(503) 229-6825	anderson.jim@deq.state.or.us
Dana Bayuk	(503) 229-5543	bayuk.dana@deq.state.or.us
Heidi Blischke	(503) 229-5556	blischke.heidi@deq.state.or.us
Tom Gainer	(503) 229-5326	gainer.tom@deq.state.or.us
Dan Hafley	(503) 229-5417	hafley.dan@deq.state.or.us
Jill Kiernan	(503) 229-6900	kiernan.jill@deq.state.or.us
Matt McClincy	(503) 229-5538	mcclincy.matt@deq.state.or.us
Kevin Parrett	(503) 229-6748	parrett.kevin@deq.state.or.us
Mark Pugh	(503) 229-5587	pugh.mark@deq.state.or.us
Mark Reeves	(503) 229-5157	reeves.mark@deq.state.or.us
Tom Roick	(503) 229-5502	roick.tom@deq.state.or.us
Mike Romero	(503) 229-5563	romero.mike@deq.state.or.us
Jennifer Sutter	(503) 229-6148	sutter.jennifer@deq.state.or.us
Bill Robertson	(503) 229-6843	robertson.bill@deq.state.or.us

Table 1: Results of 1999 DEQ Project Manager evaluation of the potential relationship between in-water sediment contamination and upland sites already in the process of cleanup (active sites in 1999, information based on 1999 data)

	Site	Project Manager Input	DEQ Follow-Up
ν	Mobil Oil	PAHs, As, & Zn are likely site related.	Evaluation to be completed as part of Mobil Oil site response.
V	Gundèrson	Pb, Hg, Zn, & PCBs at SD 151 likely to be attributed to site.	Current project does not encompass portion of site that is likely source for SD 151 contaminants. Will be identified for follow-up in site discovery.
		SD 143 elevations likely attributed to City outfall.	DEQ to work with City to assess SD 143 elevations.
	Elf Atochem	DDT is likely site related.	Consider other sources for PAHs, metals, & phthalates in site discovery.
V	(Arkema)		Evaluation of DDT & possibly contaminants identified above to occur as part of Arkema site response.
	Time Oil	PCP is currently the only contaminant of concern at this site.	Consider other aources of Zn, As, Cu, Hg, PAHs, & pathalates in site discovery work with City to assess impact from City sewer outfall.
<b>V</b>	GASCO	PAHs are site related, metals may be site related.	Consider other sources for metals, phthalates & TBT in site discovery.
v		Phthalates & TBT do not appear to be site related.	Evaluation of PAHs & possibly metals to occur as part of site response.
`.\'	NL Gould	Pb may be site related. Other compounds likely to be associated with other nearby active projects.	Evaluate as part of site response for this & other nearby sites.
<b>V</b>	Rhone Poulenc	PAHs do not appear to be site related.	Evaluation of As, DDT, & assessment of Cr, phthalates, Ni, Zn, to be completed as part of site response.
		As & DDT are site related.	Consider other sources for PAHs, Cr, phthalates, Ni, & Zn in site discovery.
		Cr, phthalates, Ni, Zn are elevated at the site, but it is currently unclear if source is on-site.	
	Linnton Oil Fire	Extent of contamination limited to site- did not extend to river.	Other sources of contamination will be evaluated for sediment detections.
V	Training Grounds	PCP not a pimary contaminant of concern for the site.	,
. /	Terminal 4 (Slip 3)	PAHs & metals are associated with the site.	Evlauation of PAHs, metals to be completed as part of site response.
~		Phthalates are not a known site contaminant.	Consider other sources for phthalates in site discovery.
	ARCO	PAHs likely site related.	Evaluate as part of site response.
<i>v</i>	·	As may not be site related.	

	Site	Project Manager Input	DEQ Follow-Up
V	McCormick &	As likely site related.	Contamination to be evaluated as part of site response.
7	Baxter	Note that some contaminats at adjacent Willamette Cove site are attributable to this site: however, Hg, DDT are not.	Additional evaluation of Willamette Cove warranted.
	Riedel	Contaminants likely site-related.	Contamination to be evaluated as part of site response.
V	(Triangle Park)	TBT may have an up-river source as well.	Some TBT may be associated with Portland Shipyard.
		No known sources of DDT on site.	DDT may be harbor-wide issue.
7	U. S. Moorings	PAHs may be site related or related to other nearby sources.	Evaluate as part of site response for this & other nearby sites.
1	Willamette Cove	Cr, Hg, Ni, Zn, Cu, TBT, & some PAHs likely site related.	Evaluate as part of site response.
1	Willbridge	Pb, Hg, & DDT likely to be site related.	Pb, Hg, & DDT to be evaluated as part of site response
		Phthalates not likely to be site related.	Consider other sources of phthalates thru site discovery.
J	Swan Island	Contaminants likely site related, however, other sources are present as well.	Portland Shipyard data have been reviewed as part of site discovery effort.
7	(Portland Shipyard)		Other potential sources in this area have been identified.

As = arsenic

Zn = zinc

Pb = lead

Hg = mercury

Cr = chromium

Ni = nickle

Cu = copper

DDT = dichlorodiphenyltrichloroethane

PCP = pentachlorophenol PAH = polycyclic aromatic hydrocarbons

TBT = tributyl tin

SD = storm drain

Table 2: Sites identified by DEQ in 1999 as part of the Portland Harbor Site Discovery Process (information is from 1999 data)\*\*

Leason Status

Site Name	Site Address	Priority
ACF Industries	12160 NW St Helens Rd, Portland	High priority for RI
Alder Creek Lumber	14456 Gillihan Loop Rd, Portland	Med/low priority for PA
Babcock Land Company, LLC	NW Front Ave, Portland	Med/low priority for PA
Chevron Asphalt	5501 NW Front Ave, Portland	High priority for XPA
Christenson Oil	3821 NW St Helens Rd, Portland	High priority for XPA
City of Portland	6543 N Burlington, Portland	Med/low priority for PA
Water Pollution Lab	-	
City of Portland		High priority for RI
Stormwater Outfalls		<u> </u>
Columbia Sand & Gravel	10504 NW St Helens Rd, Portland	High priority for RI
Container Recovery	3900 NW Yeon St, Portland	Active site at time of listing,
		but not considered potential
		PH source
Crawford Street Corp	8524 N Crawford St, Portland	High priority for XPA
Foss Marine/ Brix Maritime	9030 NW St Helens Rd, Portland	High priority for XPA
Fred Devine Diving & Salvage	6211 N Ensign St, Portland	High priority for XPA
Freightliner (Truck Plant)	6936 N Fathom St, Portland	Med/low priority for PA
Front Ave, LP	4950-5200 NW Front Ave, Portland	High priority for XPA
GATX Linnton Terminal	11400 NW St Helens Rd, Portland	High priority for RI
Georgia Pacific Linnton	12222 NW St Helens Rd, Portland	High priority for XPA
Hampton Lumber Sales/CMI NW	4950 NW Front Ave, Portland	High priority for XPA
Hendren Tow Boats	8444 NW St Helens Rd, Portland	High priority for XPA
Jefferson Smurfit	9040 N Burgard Way, Portland	High priority for XPA
Lakeside Industries	4850 NW Front Ave, Portland	Med/low priority for PA
Linnton Plywood Association	10504 NW St Helens Rd, Portland	High priority for RI
Lone Star NW	5034 NW Front Ave, Portland	High priority for XPA
Mar Com Holding LLC	9070 & 8970 NW Bradford, Portland	High priority for RI
Marine Finance	8444 NW St Helens Rd, Portland	High priority for XPA
McCall Oil/Great Western	5480 NW Front Ave, Portland	High priority for RI
NW Pipe Company	12005 N Burgard Way, Portland	High priority for XPA
Oregon Steel Mills	14400 N Rivergate, Portland	High priority for RI
Owens-Coring Fiberglass	11444 NW St Helens Rd, Portland	High priority for XPA
PGE Harborton Substation	12430 NW St Helens Rd, Portland	High priority for RI
Port of Portland Terminal 4 (ASA)	11040 NW Lombard, Portland	Med/low priority for PA
Port of Portland Terminal 4 (Slip 1)	11040 NW Lombard, Portland	Med/low priority for PA
Port of Portland Terminal 5	15540 N Lombard, Portland	Med/low priority for PA
RK Storage	10937 NW Front Ave, Portland	Med/low priority for PA
Ro-Mar Transportation	9333 N Time Oil Rd, Portland	Med/low priority for PA
Santa Fe Pacific Pipeline	6565 NW St Helens Rd, Portland	Med/low priority for PA
Schnitzer Kittridge	4959 NW Front Ave, Portland	Med/low priority for PA
Schnitzer Steel Works	12005 N Burgard Way, Portland	High priority for RI
(Schnitzer Burgard)	1	
Shaver Transportation	4900 NW Front Ave, Portland	High priority for XPA
Texaco Terminal/Loading Dock	3800 NW St Helens Rd, Portland	High priority for RI
Time Oil (St Helens Facility)	9400 NW St Helens Rd, Portland	Med/low priority for PA
U. S. Coast Guard	6767 N Basin Ave, Portland	High priority for RI
Wacker Siltronics	7200 NW Front Ave, Portland	High priority for RI
Transloader International	8444 NW St Helens Rd, Portland	Med/low priority for PA
(General Construction Company)	The section of the se	modilett phoney for 174
UPRR St Johns Tank Farm	6908 N Roberts, Portland	Active site at time of listing,
S O. COMING TERM FEITH	Tobolio, Foliano	but not considered potential
		PH source

<sup>\*\*</sup> This list does not include active sites listed in Table 1

RI = Remedial Investigation; PA = Preliminary Assessment; XPA = Expanded Preliminary Assessment PH = Portland Harbor

High done work PAPP

Table 3: New Sites in Portland Harbor identified through the Site Discovery Process (2000 to present)

Site Name	Site Address	Priority
Anderson Brothers Property	5275 & 5315 NW St Helens Rd, Portland	Med/low priority for PA
Calbag Metals	4927 NW Front Ave, Portland	High priority for XPA
Columbia American Plating	3003 NW 35th Ave, Portland	PPA
Consolidated Metco	13940 N Rivergate Blvd, Portland	High priority for XPA
Freightliner (Parts Plant)	5400 N Basin, Portland	High prioirty for XPA
GE Decommissioning	2727 NW 29th Ave, Portland	High priority for XPA
GS Roofing	6350 NW Front Ave, Portland	Med/low priority for PA
Galvanizers	2406 NW 30th Ave, Portland	High priority for XPA
Goldendale Aluminum	2600 N River St, Portland	High prioirty for XPA
Guild Lake Rail Yard	3500 NW Yeon, Portland	High priority for RI
Olympic Pipeline	9420 NW St Helens Rd, Portland	High priority for XPA
PGE Forest Park	4400 NW Block St, Portland	Med/low priority for PA
PGE Substation E	2635 NW Front Ave, Portland	Med/low priority for PA
Port of Portland Terminal 1 S	2100 NW Front Ave, Portland	High priority for RI
Port of Portland Terminal 1 N	2200 NW Front Ave, Portland	Med/low priority for PA
Port of Portland Terminal 2	3556 NW Front Ave, Portland	Med/low priority for PA
Premier Edible Oil	10400 N Burgard Way, Portland	High priority for RI
Sulzer Pump	2800 NW front Ave, Portland	High priority for XPA
UPRR Albina Yard	2745 N Interstate, Portland	High priority for XPA

RI = Remedial Investigation; PA = Preliminary Assessment; XPA = Expanded Preliminary Assessment PPA = Performance Partnership Agreement

Priority HML NS...

Table 4

**DEQ Milestone Report** 

Controlling Confirmed or Suspected Upland Sources of Contamination to Portland Harbor

Windschool & Outer

Shading indicates that upland source control work has been completed Source Control Evaluation (SCE) Confirmed or suspected SOUICES of contemination to the rive Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs) Site information Project status Status o lajor BCE tanks to be notamina misration ECSI S 8 maintenance reculrements 25 activities to be done and achacuje (m-m) 3 23 J 20 7 Petrusy 1 priority level 10 (8 -19 21 6 11 Size priority level (# 16 15540, 15650 & 15560 N Lombard Overland Insport/Shee Flow rignificant pagrar no actions recommended Welting on SCI Tom Geiner io be determined T2/ ХРА 2006 Low 2009 1.9 E 8 15580 H Lamberd no ections Weiting on SCE to be completed 2008 Tom Gainer 1686 XРА 03/02/08 Stank Erosion 15540, 15550 & 15560 N Lomberd Valting on SCE be completed 2006 alting on SCE to be completed. Coardinate with Oregon Steel Mills monitoring Terminal 5 1.5 E XPA 03/02/08 Ongoing Weiting on SCE to be completed 2006 aiting on SCE to be completed XPA 2006 Ondolno 15540, 15530 & 15560 N Lomberd 1.5 E Tom Geiner Overwitter erminal 5 IGA XPA 03/02/08 N/A N/A N/A N/A N/A N/A N/A NA N/A N/A N/A N/A N/A N/A 15540, 15550, & 15580 N Lamberti Terminal 5 XРА N/A 03/02/06 Other N/A M/A N/A NVA N/A N/A N/A N/A N/A ΝA PH Agrifor BUSCM (6/00 None e High N/A N/A N/A Valting on SCI be complete 2006 14400 N Rivergate Heidi Blachka PH Agrifor RMSCM (6/00) 22 € RI 03/15/06 Bent Emelor April 2006 SCE submitted to EPA 10/200-no comments received 508-eubmitted 504-10/2004 Soil remove) completed at time of spill, prior to SCE 14400 N Rivergate no actions no actions recommended Groundwater (JOT & ANT Heidi Blachius PH Agr for RI/SCM (6/00) 22 E 03/15/06 received 14400 N Rivergate PH Agrilor RUSCM (6/00) to be 2.2 E 03/15/08 14400 N Rivergate Valting on SC Heki Siechke PH Agr for RI/SCM (6/00) Further investigation of stormsever system 22 E RI 03/15/06 Stormweter Ongoing p Hilgh 4000 14400 N Rivergate regon Stee Mills 22 E 00/15/06 NIA N/A N/A N/A Other - oursell NPDRS presided their reger alting on SCE to b completed regon Ste Mills 14400 N Riverpain Held Obschie PH Agr for RVSCM (8/00) Waiting on SCE 2.2 E RI 03/15/06 To be determined Overland eneporySheet 03/20/08 N/A N/A N/A NA N/A N/A NA N/A none NIA NA 14444 MW Gastran Loop No PM 03/20/08 NA N/A N/A N/A N/A Sank Erosion N/A N/A 14444 NW Gillian Loop siting on SCE to be completed Waiting on SCE to be determine 03/20/06 PA 2007 Ongoino ongoing 14444 NW Gillinan Loop Esco Land'8 No PM 26 03/20/08 N/A PA NA NA N/A Stamente N/A N/A N/A 14444 NW GZBhan Loop 26 03/20/06 Overwater N/A N/A N/A N/A NA N/A NA N/A N/A PA NVA N/A N/A none . 14444 NW GEENEN LOOP No PM Assigned Eaco Landill industrial landfill disposal permit N/A ΝA 03/20/01 N/A N/A N/A N/A N/A N/A Other N/A N/A N/A none N/A Overtand N/A N/A N/A N/A N/A N/A N/A XPA 03/06/06 naparyS Flow N/A N/A N/A N/A none PLow N/A N/A N/A 3940 N Rivergate Mike Romero N/A N/A N/A N/A N/A N/A N/A NA XPA 03/06/06 Bank Erosion N/A N/A N/A N/A

Shading indicates that upland source control work has been completed.

	Conf	rmed o	r susp	ected SOI	ICES	of contemine	ion to the	river			Source C	ontrol Ev	luation (S	CE)			Source	e Control	Decisions	(SCDs) an	d Status of	Source Con	trol Me	asures (	SCMs)
i				mation		TVS# SF		DAM GAT	Potentia		· · · · · · · · · · · · · · · · · · ·	T					t status	<del></del>	T RIGHT OF THE	T SUSPECTABLE	MARIA DI VIGINI SI	PTGGGGGG SCN	THEATTE	1 WAND 20 EVA	CBAPASON ENG
	Ste name	ECSI #	ROver mile	Address	DEQ PM	agreement directine source	Project status	modified (m-d-v)	contaminent migration	Status of SCE	Major SCE testes to be completed	Schedule for completing SCE		needed		review of SCE dectalen	alternatives evaluation and achedule (m-v)	Selected SCMs	review of SCM selection decision	completed to date	controlled	activities to be done and schedule (m-v)	completed (m-v)	review of completed SCM	maintenance requirements
1											<u> </u>		Pathway determination	Pathway priority level	Site priority level		<u>(</u>					İ		í í	ľ
١.	Consolidated Metoo	3295	2.8 E	3940 N Rivergate	Mile Romero	PH Letter Agr for XPA	ХРА	03/06/06	Groundwater	Ongoing	DEQ is ravisiting draft SCD	2007	Waiting on SCE to be completed.	p Low		Weiting on SCE to be completed									
- \	Consolidated Matco	3295	2.8 E	3940 N Rivergate	Milus Romero	PH Letter Agr for XPA	ХРА	03/06/06	Stormwater	Ongoing	DEQ is revisiting draft SCD	2007	Waiting on SCE to be completed	p Low		Waiting on SCE to be completed									
	Consolidated Melco	3296	2.0 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	хРА	03/06/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4	Consolicated Metco	3296	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	XPA	03/05/08	Other	NIA	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7			8N()		Mark Control	Rycox (sco)	MMM (1) LIN Completed	200000 200000	Continue Transports					III rome					lua.				与最高		
1						RVSCO (SSS)	<b>1895</b>	1000000					Michigan Company	2		EPA revisated		No SC 4 resource					4400		
	虚					100							relative programy					MO SCAL COMPANY							
		- B	经			SET LOS TURBS							in (91 Killing) (14 tra (million) poti wery (14) (no actions (62) (14) (no actions (62) (14) (no actions (62) (14) (no actions (62)			STATE OF STA									
	200	酮	報			, dic.(c.)					AL LUCTURES SANSON														
1/			単数													MINISTER COLUMN	animamentanian								
<u>A</u>	Harton Di	HOIM	捕		ARCENC)			Brynne d	Overland	-		OKENIO INCIDENTIA	THE PERSONAL PROPERTY.	Manaileti	itestrani	Hillibreitik			(1811) (131mis (111 <b>44)</b>	(COLUMN SECTION	IN CONTRACTOR OF THE PARTY OF T	almiglinamilesina	di Berulli,	(Callingual 1998)	HTTPRAHMOSTURET
T2	Time OI	170	3.4 E	10360 Time Oil Rd	Tom Roks	(9/96)	Ri	03/07/06	Transport/Sheet Flow	N/A	N/A	NVA	N/A '	none	High	N/A	N/A	N/A	N/A	NA	N/A,	N/A	N/A	N/A	N/A S
1	Time Of	170	3.4 E	10350 Time Of Rd	Tom Rolds	Pre-PH Agr. (9/95)	RI	03/07/06	Bank Erosion	N/A	N/A	N/A	N/A	rone		' N/A	N/A	N/A Passive NAPL	N/A	N/A	NIA '	N/A	N/A	N/A	N/A
	Time Oil	170	34E	10350 Time Oil Rd	Tom Roids	Pre-PH Agr. (9/98)	Rı	03/07/08	Angrideum Photosta	Ongoing	RI Report Final 12/05	SCE to be aubmitted 5/06	Waiting on SCE to be completed	p Low		Waiting on SCE to be completed	_	recovery pending SCE				'	<u> </u>		
$\cdot \mid \cdot \mid$	Time Off	170	34 E	10350 Time Oil Rd	Tom Roids	Pre-PH Agr. (9/95)	Ru	03/07/08	Groundwater (Feets Flums)	Completed			SCMs retard pents migration and prevent pents discharge to private stormwater outful	High		SCE submitted to . EPA.	alternatives evaluation completed	Source area pump & treat: Insitu chemical caldidain; gw to ew intercept pump & treat	SCM submitted to EPA May 2004, partners responded with questions	Ongoing pump & treet; 3 rounds of inelty chemical oxidation	23 million gallone of groundweller pumped and treated	orgoing groundwets; pumpé trest			molesenance and monitoring of pump & treet system
	Time Oil	170	3.4 €	10380 Time Oil Rd	Tom Roick	Pre-PH Agr. (9/96)	RU	03/07/06	Storriwater	Ongoing		SCE to be submitted 5/08	Insignificant pathway (see above re gw/storm(rain)	p Low		Waiting on SCE to be completed									
	Time OI	170	34 E	10360 Time Of Rd	Tom Rolds	Pre-PH Agr. (9/96)	RI	03/07/06	Overwater Activities	Ongoing		SCE to be submitted 5/08	No known current sources (spills reported to OERS)	p Low		Walting on SCE to be completed									
4	Time Oil	170	3.4 E	10350 Time OII Rd	Tom Roks	Pre-PH Agr. (9/06)	RI	03/07/06	Other	N/A	N/A	NIA	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A '	NIA	N/A	N/A
TZ	City of Portland Outfalls	ALPON I	3.5 to 9.2	sadeta	Tom Roick	IGA for RI SCNI (8/03)	RI	03/13/08	Overland Transport/Sheet Flow	N/A	N/A	· N/A	N/A	none	p⊁Migh	N/A	N/A	N/A	· NIA	N/A	NA	N/A	N/A	N/A	N/A
	City of Portland Outlets	(fillship)	3 5 to 4!	variant	Tom Roids	IGA for RISCM (6/03)	RI	03/13/06	Baril Erosion	N/A	NIA	NIA	N/A	none		N/A	N/A	N/A	NIA	N/A	NIA	N/A	N/A	N/A	N/A
1 (	City of Portland Outside	Minani	5.5 tu C 2	varlate	Tom Roks	IGA for RI SCM (B/03)	Rs	03/13/08	Groundweter	N/A	N/A	, N/A	N/A	none		N/A	N/A	NIA	· N/A	N/A	N/A	N/A	N/A	N/A	N/A

Shading indicates that upland source control work has been completed.

	Conf		r suspe		ırces	of contamina	tion to the	river			Source Co	ontrol Eva	luation (S	CE)		Project		e Control	Decisions	(SCDs) and	Status of	Source Conf	rol Me	asures (	SCMs)
	Site name	ECSI #	River	Address	DEQ PNI	1998 07 agreement directing acures	Project status	medified (m-d-v)	Potential contaminant micration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determin.  Pathway determination	ntion that sou needed Pathway priority level	Site priority	btatus of EPA review of SCE decision	Source control eternatives control and achedule (m-v)	Selected SCNs	SIMILIT OF EPA review of SCM selection decision	SCM SCUVIUS completed to date (m-v)	table of volume of conteminents controlled	Proposed SCE activities to be done and aphedule (m-st)	Data signs completed (m-v)	Status of EPA review of completed SCIS	Openiten Erio maintenance requirements
	Oity of Portland Outlats	various	35e 02	vains	Tom Roick	IGA for RI SCM (S/03)	Ri	03/13/06	Stormwater	Ongoing	Complete outsit screening and characterization	ongoing through 2006, corresponding to Portland Harbor ROD	Suspected pathway	p High		Walting on SCE to be completed.		Ongoing SW Inspections, line maintenance, investigations of illicit discharges: is entitlection of potential contributors to City system; Implementation of BMPs			<del></del>				
1	City of Portand Outfalls	veilors	3 6 to 5 2	ranous	Tom Roids	IGA for RI SCM (8/03)	Ri	03/13/06	Overwater Activities	N/A	N/A	N/A	N/A	none	1	NIA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
V_	City of Postland Outside	e de la lace	15m 62	HMM	Tom Role	IGA for RI SCM (8/03)	RI	03/13/06	Other	N/A	N/A	N/A	, N/A	none	1	N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	, N/A
T2	ACF Industries	W.	3 0 W	12 (60 NW St) Hetene	Dan Halley	Urdintered Order (6/00)	FS compress	03/06/06	Overland Transport/Sheet Plose	H/A L	egr. NA.	, NA	, Mark	none	سما ا	H/A.	HIA 11	1	N/A	NA.	NUAL	NZA	NA	, N/A	NA
1	AGF Industries	794	36W	12150 NW SI	Den Helley	Unincered Order (8/93)	Constete	03/08/06	Bank Erusion	NZA	NIA	HIA	NA	none		N/A	NIA I	NA.	N/A	N/A	NIA	N/A	N/A	NIA	N/A
1	ACF Industries	PB4	3.6 W	12100 NW St Halens	Dan Holley	Unfateral Order (5/00)	complete	03/08/06	Geolandwag tor	Completed	in the state of	19	inelgraticent pathway; ro estione reconstruction	ine 14		SCE submitted to EPA (10/04); no comments		No BCM resolut			1045			SCM autoritied to EPA ( 10704). No communica.	
	ACP Industries	784	36W	12150 MW 50	Den Herlig	Urfleieral Order (5:00)	25	(13/03/06	Summerter	Completed			Currently ineignificant permety stampached past migration pathway	ll .		SCE submitted to EPA (10/04); no consinerts		Completed E8 proposes removal of contaminated of arise and potentially available for prespect to research			The state of the s			SCM subtritued to EPA (1904). No posttrants.	
	AGF Incusting	794	3.6 W	1111	Dan Habey	Undecimal Order (8/00)	Fg complete	03/06/06	Overwater Activities	N/A	NIA II	N/A	N/A	nonte		1144	1 NA	4	NIA	<b>11 100</b> 11	NUA 11 1 1 1	nua.	NIA	nui.	N/A
4	ACF Industries	794	3.6 W	12160 HW St	Den Halley (1)	Untilitieral Order (9/00)	F-6 complete	00-040e	Other	HIA	N/A	N/A	NUA	none		H/A	N/A	NA .	fi financia Ma	N/A	, I N/A	NA	NA,	N/A	N/A
T3	Premier Edible Olls	2013	3.5 E	10400 N Burgard	Måte Romero	PH Agr for RI/SCM (7/01)	RI	03/08/08	Overland Transport/Sheet Flow	Ongoing	Complete first phases of RI	2006	Walting on SCE to be completed.	to be determined	to be determined	Waiting on SCE to be completed. (2006)									
}.	Premier Edibia Olia	2013	3AE	10400 N Burgard	Mike Romero	PH Agr for RUSCM (7/01)	Ri	03/08/08	Bank Erosion	Ongoing	Complete final phases of RI	2006	Welting on SCE to be completed	to be determined		Waiting on SCE to be completed. (2006)									
	Premier Edible Ote	2013	36E	10400 N Burgard	Mike Romero	PH Agr for RWSCM (7/01)	RI	03/08/06	Stormwater	.N/A	N/A	N/A	Facility dismantled and outhile removed	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Premier Extible Ota	2013	3.8 E	10400 N Burgard	Mite Romero	PH Agr for RI/SCM (7/01)	RJ	03/08/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spille reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Premier Edible Offe	2013	3.8 E	10400 N Burgard	Mika Romero	PH Agritor RUSCM (7/01)	RI	03/08/08	Groundwater (C)YF L 4APL -QYF Crin era	Ongoing	Complete data collection for SCD design	2006	LNAPL potentially discharging to river	p High		Watting on SCE to be completed, 2006									
	Premier Edible Oits	2013	30 E	(0400 N Burgard	Mike Romero	PH Agr for RIVSCM (7/01)	RI	03/08/08	Groundwater (Fermale ing GM/ (990-02)	Ongoing	Coordinate investigation with Time OS/Bell Terminal near property boundaries	. 2006	GW suspected migration pethway	to be determined		Walting on SCE to the completed, 2008									
1	Premier Edible Offs	2013	36E	. 10400 N Burgard	Mike Romero	PH Agr for RUSCM (7/01)	RI	03/08/06	Other	N/A	N/A	N/A	N/A	none	-	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
T2	Jefferson Smurft	2371	37 E	9930 N Burgard	Mert MoCancy	PH (attai Agr (or XPA (12/00))	XPA.	03-05-06	Overland Transport/Shint	HEA !	NA.	NA III	III NVA	none	i pa	NA	NGA	HIA.	NIA 1	MA TO	NA.	NA.	N/A	N/A	NA
1	Jeffenson Brounts	2971.	3.7 E	DO30 N Burgard	Mes McClinoy	PH Letter Agr for XPA (12/00)	XPA	03/08/08	Bank Eroekin	NA	Land Marketing	NA.	H. WALLEY	norm.		N/A	" "HOLLIFE SE	NA:	PH NA. II.	. NA	N/A	N/A	l N/A	N/A	NIA
$\checkmark$	Jafferson Stravita	2371	s,i €	9930 N Burgard	Mart McClincy	PH Letter Agr for LXPA (1200)	ΧРА	03/06/06	Grundestur	Completed			reignificant pathwey; no actions recommended ()	ر ا برا برداد:		EPA reviewed and summeried, 19/2002		No SCNI number				1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		1 h	

3 of

PROBLEM - Shading indicates that unland source control work has been completed

Ę	Confi				ırces	of contaminat	ion to the	river			Source Co	ontrol Eva	luation (So	CE)				e Control	Decisions	(SCDs) and	Status of	Source Con	troi Me	asures (	SCMs)
H	_	$\overline{}$	River			Type or	Project	DAM MAY	Potential	Status of	Major SCII tasks to be	Schedule for	Basis for deterrain	stion that sour	ce control is	Project	SOUTH COMPO	I	STERUS SI EPA	SCH BERVINSE	MANUE OF VOIDING OF	Proposed SCH	DIMBOR	BURBLE OF EPA	Operation and
- [	ite neme	ECSI #	mile	Address	DEQ PM	agreement directing source	etak.e	(modified )	micration	SCE.	completed	completing SCE		Pethwey	Site priority	feview of SCE decision	alternatives evaluation and achedule (m-y)	Selected SCNs	review of SCM selection decision	completed to date (m-y)	contamizants controlled	activities to be some and echedule (m-v)	completed (to-v)	review of completed \$4;36	meintenance reculraments
L			Ш										determination	priority level	level										
) [	efector Emurat												rate that terming rate them partners		MM J	BPA HONORED									
' L						ASA (12/00)						INCOMPRESSOR AND PROPERTY.	IN CONTRACTOR												
	effector ( Omarit M Jefferson ( Smartt M	237	0.6	TRANSPORT	Marine Victory	PH Letter Agr for BLOPA (12000) W PH Letter Agr for BLOPA (1200) M		63000		8 8				i Consti								(1) (da) (1)		E3 [3	
7	Mar Reelty	2437	17.45	9333 N Time	(MoClinicy) Tom	PH Lir Age for	XPA	03/02/06	Overland Transport/Sheet	Completed	Michigan Minner State (1984)	HINDSON MI	Insignificant pathway: no actions	Lon	FOM 18	pending EPA 3/2008 raview		ICHNING CORNER	ADMINITED HARMY	WHILE STATES	DIMENSION NEW YORK	1144	140	(221	(2)
~ ⊦	d Oragon Mar Resty	<u> </u>	$\vdash$	Oli B333 N Time	Ceiner	XPA PH Lir Agr for			Flow			_	recommended (neignificent pethway)			pending EPA							-		
L	of Oregon	2437	3.7	Oil	Geiner	XPA	XPA	03/02/06	Bank Erosion	Completed		_	no actions recommended insignificant pathway,	Low.		3/2006 review									
L	Mar Realty of Oregon	2437	3.7	8333 N Time OS	Tom Geber	PH Lir Agr for XPA	XPA	03/02/06	Groundwelter	Completed			no actions recommended insignificant pathway;	Low		pending EPA 3/2006 review									
Ľ	Mar Reelly of Oregon	2437	3.7	9333 N Time CB	Tom Gelner	PH Ur Agr for XPA	ХРА	03/02/06	Stormenter	Completed			no ecéone recommended	Low .		pending EPA 3/2000 review						:			
*	Mar Realty of Oragon	2437	3.7	9333 N Time Oil	Tom Gainer	PH Ltr Agr for XPA	XРА	03/02/06	Overseter Activities	N/A	N/A	N/A	N/A	none		NUA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<u> </u>	Mar Restly of Onegon	2437	3,7	8333 N Time Of	Tom Galmer	PH Lir Agr for XPA	XРА	03/02/06	Other	N/A	N/A	N/A	NA	none		N/A	N/A	N/A	NA	N/A	N/A	N/A	N/A	N/A	N/A
-	Owene- Coming	1036	38W	11444 MW St	Tom	PH Letter Agr for	ХРА	03406/06	Overtand Transport/Sheet	Ongoing	Visual (repection	SOW currently being	Walting on SCE to be	to be	to be	Waiting on BCE									
	Trumbul Aup)			Helene	Geiner	XPA (12/99)	~~		Flow			Implemented.	completed	determined	determined	to be completed; 2908									
	Corning Corning Ibergines Trumbuli	1038	3 8 W	11444 NW SI	Tom Geiner	PH Letter Age for	XPA	03/05/06	Bank Eroslon	Ongoing	Vieus inspection	SOW currently being	Waiting on SCE to be	to be		Waiting on SCE to be completed. 2006		ĺ '			i			i i	ł
L	Trumbull Asp) Owens- Coming	<u> </u>	$\sqcup$			XPA (12/98)	_		·			implemented.				2006						<u></u>	<u> </u>		
	Coming Iberglase Trumbul	1038	3 8 W	11444 NW St Helene	Tom Geiner	PH Letter Agr for XPA (12/99)	XPA	03/06/06	Groundweter	Compleme			insignificent pathway: no actions	Low		Waiting on SCE to be completed; 2005									Ï
	Ago)		$\vdash$										recommended			-	· ·								
	Owers- Corring Therplass Trumbull	1036	3.8 W	11444 NW St Halana	Tom Geiner	PH Letter Agr for XPA (12/99)	ХРА	03/06/06	Stormwater	Ongoing	iritiate etormester evaluation	2007	Weiting on SCE to be completed	· to be determined		Waiting on SCE to be completed; 2006									
  -	Arp) Owens- Coming Ibergiass	<u> </u>	-						-	<u> </u>									_					·	
· [	Trumbull	1036	3.8 W	11444 NW St Halans	Tom Gainer	PH Letter Agr for XPA (12/99)	XPA	03/06/06	Overwater Activities	N/A	. N/A	, N/A	N/A	none ).		N/A	N/A	N/A	. N/A	N/A	NIA	N/A	N/A	N/A	N/A
- F	Asp) Owens- Coming	_	$\vdash$		-																				
7	ibergions Trumbuli	1038	38W	11444 NW St Helens	Tom Gainer	PH Letter Agr for XPA (12/99)	XPA	03/06/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	· N/A	N/A
2	Amp) Georgia Pacific	2370	3 B W	12222 NW	Tom	PH Letter Agr for	χРΑ	03/06/06	Overland Transport/Sheet	Completed			Insignificant pathway; no actions	LOW	to be	EPA reviewed		No SCM needed				*			
- -	Limiton			Marina	Gainer	XPA (10/99)			Flow			<u> </u>	recommended		determined	and commented									
	Georgia Pacific Linnton	2370	3.9 W	12222 NW Marina	Tom Gainer	PH Letter Agr for XPA (10/99)	XPA	03/06/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A *	N/A	N/A	NIA	N/A	N/A	N/A	N/A
F		·	H																		· · ·				
-	Georgia Pacific Limiton	2370	3.9 W	12222 NW Marina	Torn Guirrer	PH Letter Agr for XPA (10/99)	XPA	03/06/06	Groundwater	Ongoing	RP needs to do additional groundwater evaluation work	to be determined	Waiting on SCE to be completed	to be determined		EPA requested additional GW sampling				.				]	
.			$\vdash$		ļ						·		· .												
	Georgia Pacific Limnon	2370	3.9 W	12222 NW Marina	Tom Geher	PH (atter Agr for XPA (1099)	XPA	03/08/06	Stormwater	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A
	Georgia Pacific Linnton	2370	3.9 ₩	12222 NW Marina	Tom Galren	PH Letter Agr for XPA (10/99)	ХРА	03/06/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	, none		N/A	N/A *	. NA	NIA	NIA	N/A	N/A	N/A	N/A	N/A
/	Georgia Pacific Libraton	2370	39W	12222 NW Marina	Tom Gainer	PH Letter Agr for XPA (10/99)	XPA	03/05/08	Other	NVA	N/A	NIA	N/A .	none		N/A	N/A	N/A	N/A	N/A	N/A -	N/A	N/A	N/A	N/A
Ţ	MW Pipe	. 138	3.9 E	12005 N	Mûle	PH Agr for	Ri	03/08/06	Overland Transport/Sheet	N/A,	R/A	N/A	N/A	none	to be	N/A	N/A	N/A	N/A	N/A	N/A ·	N/A	N/A	N/A	N/A
<u> </u>			3.9 2	Burgerd	Romero	RI/SCM (2/05)			Flow						determined								l		4 of 24

WEITHIN - Shading indicates that upland source control work has been completed.

	Confin				urces	of contamina	lon to the	river .			Source C	ontrol Eva	aluation (S	CE)			Sourc	e Control	Decisions	(SCDs) and	Status of	Source Con	trol Me	easures (	SCMs)
		Site		nation		1000		T CAM WAY	T PAINTIN								t status								
São na	===	ECSI 6	River mile	Address	DEQ PM	agreement directine source	Project	modified (m-d-v)	conteminent microtion	Scatus of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determin	needed	1	Status of EPA review of SCE decision	sturnetives evaluation and schedule (m-v)	Belacted SCMs	review of SCM selection decision	completed to date (m-v)	controlled	activities to be done and schedule (m-v)	CENT BCM completed (m-v)		Operation ting maintenance regularments
					L	1	l		i .		l	1	Pathwey determination	Pathway priority level	Site priority level		}	}	1	}			1	} }	
NW PI	100	138	39E	12005 N Burgard	Romero	PH Agr for RI/SCM (2/05)	RI	03/06/08	Bank Erosion	NIA	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
MW PI	100	138	39E	12005 N Burgard	Mike Romero	PH Agr for RI/SCM (2/05)	R1	03/08/06	Groundwater	Ongoing	DEO to complete review of SCE report prepared by RP	2006	GW suspected migration pathway	to be determined		Waiting on SCE to be completed 2006				·					
NW PI	400	138	3.9 E	12005 N Burgard	M&e Romero	PH Agr for RUSCAI (2/05)	RI	03/08/08	Stormwater	Ongoing	DEQ to complete review of SCE report prepared by RP	2008	SW auspected migration pathway	to be determined		Watting on SCE to be completed 2006									
NW PI	••	135	3.0 E	12005 N Burgard	Mike Romero	PH Agr for RUSCM (2/05)	RI	03/08/06	Overwater Activities	N/A	NA	N/A	NA	none		HIA	N/A	NIA	NIA	HIA	N/A	N/A	HIA	NIA	NA
NW PI		138	3.9 E	12005 N Burgard	Mika Romero	PH Agr for RI/SCM (2/05)	RI	03/08/08	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	. N/A	N/A	N/A	N/A	N/A	₩Ą
Pro And	흟	( <del>i</del>	9			Heli	做。	(0.000)	Transport Sheet			Time	relgrik art parterty (10 setters)	, id-	c:	(33)									
Pin Ind	OI)	E-	a'				HA	03/03/00 03/03/00		(Completed)			response on parties,	썯		E.:			<b>西田地</b>	الاسانا					·
(Circo	: :		i Ka		1			APP.			4.2		Currently in )							3.5 3.7		A Comment		احد	Arrus groundwest
	5	9	10		de de	. 6	GEZ)	02:02:00	Courties	Conc			Districtions Managed Control	(Ex		(CCC)	42.15					late that the		النينا	(1974)
Pire Train	101 1	m	٥.			ූ .කෙ	ctax	0.702708	Statement	Ĉ.			Insignificant pathwey (no ections)	(K2)	75.5										
Limbo Fire ins Groun		ıω	0	事		' യ	ĽΩ	<b>02020</b> 3	<b>经</b> 运	CIX		CEA.	No known current ources (spale of b reported to OERS)	(EED)			, , <u>, , , , , , , , , , , , , , , , , </u>	,CEA		CEA	, cz	Z.	CEV	ds.	සා
Firm Trail	3	Ю	ব		6.23 2.23	E	CZ)	(87.65.00)	Ē.	台		感	EΦ	lab.		12				EZ .	<b>新</b> 秦第		4	(22)	(ap)
Schrutz Bulgar	izer ed	2365	4.1 E	12005 N Burgard	Make Romero	PH Agr for RI/CSM (3/00)	RI	03/08/06	Overland Transport/Sheet Flow	Not Started	To be determined	2008	Waiting on SCE to be completed	to be determined	to be determined	Waiting on SCE to be complete		Likely pier engineering improvements to cepture sheet flow stormweter				,			
Schotz Butga	ero i	2365	4.1 E	12005 N Burgard	Mile Romero	PH Agr for RVCSM (3/00)	RI	03/08/06	Benk Erosion	Ongoing	Additional sampling needed	2006	Waiting on SCE to be completed	to be	1	Waiting on SCE to be complete									
Schnitz Burga		2365	4.1 E	12005 N Burgard	Mike Romero	PH Agr for RVCSM (3/00)	RI	03/08/06	* Groundwater	Ongoing	ongoing monitoring	2008	Waiting on SCE to be completed	to be determined		Watting on SCE to be complete									
Schnitz Burga	izer ard	2355	4.1 E	12005 N Burgard	Mike Romero	PH Agr for RI/CSM (3/00)	RU	03/08/06	Stormwater	Ongoing	ongoing monitoring - engineering improvements have been built.	2006	Walting on SCE to be completed	to be determined		Watting on SCE to be complete		Will include RP is developing & implementing BMPs for isomwater.					j 		·
Scheltz Burgar	#d	2355	41E	12005 N Burgard	Mike Romero	PH Agr for RMCSM (3/90)	RJ	03/08/08	Overwater Activities	Not Started	To be determined	2005	Walting on SCE to be completed	to be deterrified		Walting on SCE to be complete									
Schnitz Burger	ž#	2355	4.1 E	12005 H Burgard	Mike Romero	PH Agr for RMCSM (3/00)	RI	03/08/08	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	, N/A	N/A	N/A	N/A	N/A	N/A	NIA
Kinde Morgen ( GATX	(Ata X)	1096	4,2 W	11400 MW SI Helens	Mika Romero	PH Agr for RI/SCM (8/00)	Ri	03/08/00	Overland Transport/Sheet Flow	N/A	NIA	N/A	N/A	none	p Hilgh	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	· N/A	
Kinde Morgan GATX	(Ake	1096	4.2 W	11400 NW St Halens	Mike Romero	PH Age for RI/SCM (8/00)	Ri	03/08/06	Bank Eroekon	Ongoing	To be determined	2006	Welting on SCE to be completed	to be determined		Waiting on SCE to be complete									
Kinde Morgan ( GAT)	(Aka	1096	4.2 W	11400 NW St Halana	Mike Romero	PH Agr for RI/SCM (6/00)	RI	03/06/06	Groundwater	Ongoing	Complete nature & extent in RI; RP will conduct IRAM effectiveness evaluation	2006	LNAPL seeps on shoreline and dissolve petrolitum Busy discharging to River	pHiliph		Watting on SCE to be complete		LNAPL removal and groundwater pump and treat system in operation							
Kinda Morgan GATX	(Aka	1096	42W	11400 MW St Helene	M&e Romero	PH Agr for RI/SCM (6/00)	RI	03/08/08	Stortmeater	·Ongoing	indian evaluation	2008-07	Walting on SCE to be completed	to be determined		Waiting on SCE to be complete									
Kinde Morgen ( GATX	(Aka	1096	42W	11400 NW St Hetens	Mika Romero	PH Agrifor RI/SCM (6/00)	Rì	03/08/06	Overwater Activities	N/A	N/A	N/A	N/A	home		N/A	N/A	N/A	N/A	N/A	NZA	N/A	N/A	N/A	N/A
Kinde	(Aka	1098	42W	11400 NW St Halens	Mike Romero	PH Agr for RVSCM (8/00)	Ri	03/08/06	Other	Ongoing	GW treatment system & cliveter separator on NPDES - Evaluate autisting	2008	Waiting on SCE to be completed	p Low,		Waiting on SCE to be complete								1	

INTERCED - Studing indicates that unland source control work has been completed.

[	Conf	Irmed o	or suspe	eted So	urces	of contaminat	lion to the	river			Source Co	ontrol Eva	luation (S	CE)			Source	e Control	Decisions	(SCDs) an	d Status of	Source Con	trol Me	asures (S	CMs)
į,		Sto	e Infon	mation				T HEATEN	r Parenti	_						Projec	t Status		T TEMEN OF EPA	BCM BERVINSE	T BIALL SPVSKIMA OF			SIGNUL SEPAT	USAFAGAR EAST
	83e name	ECSI #	River	Address	DEQ PM	egreement directine source	Project sixtus	medified (m-d-v)	contaminent misretion	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE		needed	r	review of SCE decision	sitematives evaluation and schedule (m-v)	Selected SCMs	review of SCM extection decision	completed to date (m-r)	contaminants controlled	activities to be done and schedule (m-v)	completed (m-v)	review of completed SCM	maintenance reculrements
		L_											Pathway determination	Pathway priority level	Site priority level		L	,							
2	Terminal 4 Step 1	2358	4.3 E	11040 N Lomberd	Torn Gainer	PH Agr for RI/SCE	Ri	03/06/08	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	P Hiliph	N/A	N/A	iNA	N/A	N/A	NIA .	N/A .	NIA	N/A	N/A
	Terminal 4 Stip 1	2356	43E	1 1040 N Lomberd	Tom Geiner	PH Agrifor RI/SCE	Ri	03/06/06	Bank Eroston	Ongoing	SCM necessary; coordinate with T4 Early Action	SOW under, development, due 2006	Pathway is complete	p Hogh		Walting on SCE to be completed	schedule for completing draft evaluation report fall 2006	,							
	Terminal 4 Sign 1	2356	4.3 E	11040 N Lomberd	Tom Geiner	PH Agr for RI/SCE	RI	03/06/06	Groundwater	Ongoing	Phase 3 RI sampling	SOW under development, due 2006	Pretiminary determination that pathway is (neignificent	pLone		Waiting on BCE to be completed		: .							
	Terminal 4 Slip 1	2350	4.3 E	11040 N Lombard	Torn Geiner	PH Agr for RIVSCE	RI	03/06/08	Skamwater	Origona	Phase 3 fill sampling	SOW under development, due 2008	Walting on SCE to be completed	to be determined		Watting on SCE to be completed		· -							
	Terrebui 4 Săp 1	2358	4.3 E	11040 N Lorrbert	Tom Geiner	PH Age for RI/SCE	RI	03/06/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none		NIÀ	· N/A	N/A	N/A	N/A	N/A	N/A	M/A	N/A	N/A
レ[	Terminal 4 Stp 1	2356	4.3 E	11040 N Lombard	Tom Geiner	PH Agr for RI/SCE	RI	03/06/06	Other	N/A	N/A	N/A	N/A	nome		N/A	N⊮A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	Licritori Physicod	2373	АДW	10e04 NW St	Mars McClinicy	PH Letter Age for XPA (3401)	XPA completed	03/13/05	Overland: TransportSheet Flow	Completed			BCM addressed his paramially complete patterny			EPA reviewed and conversed		of two email spinsor of two email upland catalite disposal in 2002 and 2003						Recalled review 8/29/03	gerale seri
	Unition Physical	23/3	45W	10004 NW St	Marg Mari Zanay	PH Letter Agr for XPA (3/01)	XPA completed	02/13/05	Gerai Escelon	Consisted			instanticum partness inciscitore esportreended	1		EPA reviewed and commission	Jan Spring C	No SCM resided	排為		il da Sas		3.5	Received review 8/29/03	ritis di s
	United Physical	2975	46W	10604 NW 6	Med McClincy	PH Letter Agr for XPA (3/01)	APA I	03/13/08	Occursonates.	Completed			indignational patterny; inc. ecoloris recommendad	اسمان		EPA reviewed and commented		Ne SCM resided				19年1月1日		Received review 9/29/03	,
	Harrion Physical	2373	AAW	DEEN NW S	MeCanoy	PH Letter Art for (1, XPA (3/01))	XPA completed	03/13/06	Storresater	Completed			inglyreficant patherny, no economical recommended insignificant patherny;	اسا		EPA reviewed and commenced		Ongoing Stormweler BMPs and morelowing		21 14 B	ful tours	4 14 14 14	:	Received review 9/29/03	
11	Lityritors Physician	2573	4.EW	10004 NVV SI 3 telepe	Mercy Marchinery	PH Leps Age for XPA (341)	XPA co <del>stulated</del>	13/13/06	Overwelse Activities	Completed	High and the second of the sec		AD MISSING INCOMPRESSION	سجا ا		and commented		No acurpadad	304 15	Section 1		1	1	Roceived review 8/29/03	1,344 3,344,7
Σ	Linnion Physicad	2373	46W	10504 NW St Halory	MeClincy	PH Ladar Altr for XPA (3/01)	porturad completed	03/12/06	Other	NA		N/A	NA .	nderes	REPORT OF	ALL MA		MAIL I	व्यक्ति (वर्ष			right from		NA .	
1	Terminal 4 Stip 3	272	4.8 E	10400 Lomberd	Tom Roick	Judgment for RD/RA (4/04)	RO/RA	03/07/06	Overland TransportSheet Flow	Ongoing	Recontamination Assessment w/ Slip 1		Walting on SCE to be completed	plow	Hagh	Waiting on SCE so be completed		,				•			
	Terminal 4 Stp 3	272	4.8 E	10400 Lomberd	Tom Roick	Judgment for RD/RA (4/04)	RD/RA	03/07/08	Bank Eroston	Ongoing	Pencil pitch investigation	SOW under development, due spring 2008	Contuminated river bank eals - penal pitch investigation continuing	p Low		Waiting on SCE to be completed						,			
' [	Terminal 4 Slip 3	272	46E	10400 Lombard	Tom Roks	Judgment for RD/RA (4/04)	RD/RA	03/07/06	Groundwater	Completed			Complete pativesy - remetly reconvended and implemented	Hgh		EPA reviewed and commented, 2/2003		Bank excevetion and back/til remedial action, NAPL recovery, monitoring	EPA reviewed and commented, 2/2003	Bank excavation and backtis remedial action (BEBRA) 11/04	2,700 cubic yards of contaminated soil removed, 24.4 gallons NAPL recovered to date	NAPL recovery and monitoring ongoing			
	Terminal 4 Stip 3	272	48 E	10400 Lombard	Tom Rioks	Judgment for RD/RA (4/04)	RDRA	03/07/06	Stormwater	Ongoing	Reconstantiation Assessment w/ SRp 1		Waiting on SCE to be completed	p Med		Waiting on SCE to be completed									<u> </u>
] را	Terminal 4 Stp 3	272	4.6 E	10400 Lombard	Tom Rotok	Judgment for RD/RA (4/04)	RD/RA	03/07/06	Overwater Activities	Ongoing	Early Action pending		Historic releases	p High		Waiting on SCE to be completed		1	ļ						
2	Terminal 4 SSp 3	272	4.6 E	10400 Lorrowni	Tom Roick	Autigment for RD/RA (4/04)	RD/RA	03/07/08	Other	N/A	N/A	N/A	N/A .	none		NIA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	JOPER SI Johns Took	2017	406	4905 N Robert	-	Prio Pri VCP Listes Agr	NPA	00/07/06	Overland Transport/Sheet Flore		I NA		4		الما			NA.	MA.		Pin I	NA	NUA	, N/A	H NA
	UPTIR St Johns Tark Feat	<b>2017</b>	4,8 E	8906 H Pober	Tom Rock	Pre-PH VCP	NEA	03/07/06	Gera Eroskon	*			Š.	300		3		1		3	ž	NA	NA H	H/A	
	UPRIR Se Johns Tars. Farm.	2017		PROCE N Process	Toen Roles	Pre-PH VCP Letter Agr		63267708	نواندون ا	Completed			reignificant petteres no actors recommended	Low		SCE submitted to EPA April 2004, no corrected received		No BCM resided						SCM submitted to EPA April 2004, co comments received	

= Shading indicates that upland source control work has been completed.

		Canfir					of contamina					Source C	ontrol Eve	aluation (S	CEL			Sour	o Control	Docisions	SCDc) and	1 Status of	Source Cont	rol Ma	201505 /	SCMe)
	·	Commi			nation	ui 063	от соптантила	tion to the	nver	l		30urca C	OHE OF EAS	aluation (5	CEJ		Project		e Colleroi	Decisions	SCDS) and	J Status Of	Source Com	.roi me	asures (	SCMS)
	6 No	neme	ECEI #	River mile	Address	DEQ PM	Type of agreement	Project	modified	POTANCIEU contaminant	Status of SCE	Major SCE tacks to be completed	Schedule for completing SCE	Bools for determin	ation that sou	rce control is	STABLE OF EPA review of SCE	SOURCE CONTROL piternatives evaluation	Selected SCMs	review of SCM	SCM ECOVICIOS Completed to date	mass of volume of contaminants	Proposed SCM activities to be done	DAIS SUM completed	STATUS OF EPA	Opension and maintenance
;	İ	ĺ					dredha source		(m-d-v)	micration				Pathway determination	Pathway priority level	Site priority level	decision	and echedule (m-y)		selection decision	(m-v)	controlled	and achedule (m-v)	, m-vi	completed SCM	reculremente
1	UP John	OR SE Territ	2017	486	6908 N Actions	Tom Roks	Pis-PH VCP Luster Age	1. <b>NPA</b>	153.07/00	Bioimester,	Certain Certain			Industrial pathway; no actions recommended	lou.		SCE submitted to EPA April 2004, no continents		No SCM needed			. i.,			t i i an i i i	
	John	er e Tarak	2017	446	8908 N Robers	Tom Roks	Pre-PH VCP Letter Agr	NEFA	03/07/06	Overweer Activities	N/A	NA	I NA	N/A ,	попе		NA	NA.	II, NA	NA <sup>1</sup>	N/A	I I NEA	N/A	N/A	N/A	N/A
V	John	08.50	2017	485	5908 N Robert	Tem Roka	Pro-PH/VCP	NFA	03/07/04	Other	N/A 3 (F	NIA	ΝA	N/A	none		N/A	N/A	N/A	NA.	NA.	NIA . I	N/A	NA ,	N/A	N/A <sup>1</sup>
72	Porte Store	nd Auto	2842	8.0E	10400 Lomber	(Tom:	Pre-PH DEO/Por	NFA 1	03/06/06	Overland Transport/Sheet Flow	N/A		N/A	N/A	none	Low	NIA	HA.	N/A	Na	MIA	N/A	N/A	N/A	N/A	NUA
1	Porte Store	nt of		,,,,	10400 Lambari	Torn Geiner	Pre-PH DEG/Port IGA (11/00)	NFA	03/08/08	Bank Eroeion	Completed	Property of		ineignificant periway, no actions	low .		EPA reviewed and commented	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	No BCM remded					- 4		
		SA) It of rid Author In Area	2542	50E	10400 Lor bar	Tom Gelner	Pre-PH DEO/Port IGA (1180)	MFA	c1/06/08	Groundwater	Completed			recommended Insignificant pediway, no actions	Lovi		EPA reviewed and commented		No SCM resided		<u>. I</u>	10-12-11		. 11 [1] 	Harrier Commen	
1	Potie	10	2842	50E	10400 Lambura	Tom	Pre-PH DEG/Port	NFA	g3/0e/06 ·	Storregatur	Completed		1	recommended Insignificant pathway; no actions	· low		EPA reviewed and correspond		No OCM presided							4.
	-#	<u> </u>	2642	60E	10400 Cambies	Geiner Tom Geiner	Pre-Pri DEO/Port	NFA	g3406/08	Overwates	MA.	inva	I NIA	No language current sources (epitie	mone		6/04 H/A	e l	HA	III NJA	NA.	d NA	, NIÀ	NIA	N/A	N/A
1	Portle	nd Auto na Area SA) nt ol nd Auto	$\dashv$		10400 Lorobano	Tom	19A (11/00) Pre-PH DEG/Port	giighte Heart	a¥9506	Activities	N/A	, AMA	NIA	reported to QERS)	nore		NIA	er gerage de Historia 13 NA	NA.	N/A	NA	NIA .	N/A	N/A	N/A	N/A
Y ri		Area (SA)	137	5,1 W	9420 NW St	(Delnor Hext)	VCP Agr for Remedial Action	ROPEA	g3/06/06	Overtand Transport/Sheet	N/A	N/A	N/A	N/A	none	High	N/A	N/A	etaga Peterlika NA	N/A	N/A	NA.	N/A	N/A	N/A	N/A
1	-	+		$\vdash$	9420 NW St	(Machke	(5/02) VCP Agr for			Flow								-								
	Econo	Mobil	137	5,1 W	Helene	Blachka	Remedial Action (5/02)	RD/RA	03/05/08	Bank Eroaton	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A .	N/A	N/A	N/A
	Exec	Mobil	137	5.1 W	9420 NW St Helens	Heid Blachke	VCP Agr for Remedial Action (5/02)	- RORA	03/06/06	Grounderster	Completed			Groundwater is a complete pethway	Hiligh		SCE planned to be submitted to EPA in Spring 2008.		Operating air eparge & SVE system. Experation of air sperge system (1/2006) - RP has 1 yr. to demonstrate protactiveness.						SCM to be submitted to EPA in tale 2005	
	Exoto	Motel	137	5.1 W	9420 NW St Helena	Heid Blechke	VCP Agr for Remedial Action (5/02)	RDARA	03/06/06	Stormwater	Ongoing	Implementing the SCE statement of work	60W under development, due 2006	Walting on SCE to be completed	to be determined		Waiting on SCE to be completed 2006									
	Exec	Mobil	137	51W	9420 NW St Halana	Heidi Bliechke	VCP Agr for Ramedial Action (5/02)	RDÆA	80/200208	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	NIA	· NIA	N/A	N/A	N/A	N/A	NJA
V	Exm	Model	137	5.1 W	9420 NW St Hatene	Hekti Bilachke	VCP Age for Remedial Action (5/02)	RO/RA	03/06/06	Other - current NPDES permitted discharge	Noi Started	To be determined	No current schedule	Waiting on 8CE to be completed	to be determined		Walting on SCE to be completed		-							
13	Po Por Feedit	mpic elline Itand y within nMobil	3342	6.2W	9420 NW St Helens	Heidi Bilechke	ICP	хРА	03/02/08	Overtand Transport/Sheet Flow	, N/A	NJA	· N/A	N/A	nome .	to be determined	N/A	N/A	NIA	NIA	N/A	NIA	N/A	N/A	N/A	- N/A
	Pip Pos Facilit	repic sline sand y within nMobil	3342	5 2W	8420 NW St Helene	Heid Blachke	Ю	хра	03/02/08	Bank Erosion	N/A	N/A	N/A	N/A	None		N/A	N/A	N/A .	N/A	N/A	NIA	N/A	N/A	N/A	N/A
1	Pip Poi Fecilit	repic silne tend y within	3342	5.2W	9420 NW St Helena	Heidi Blachke	ICP	хра	03/02/08	Groundwater	Completed			Insignificant pathway; no actions recommended	Low		Waiting on SCE completion; 2007	,	Conducted exil removal following petroleum spill in mid 1990e							

a Sharing andicates that unlend source control work has been completed

								· -																	
ļ	Confi				ITCES	of contaminat	ion to the	river			Source Co	ontrol Eva	luation (S	CE)				e Control	Decisions	(SCDs) and	d Status of	Source Cont	trol Me	asures (	SCMs)
ļ		Site	Infor	mation		1954 57		COM BUT	POLINER							Project	t status		SINUS OF EPS	KCH ROWINS 1	MAKE OF VOIGHAN OF	PRODUCED SCAL		SUM BY EPA	Operator ENG
	São name	ECBI #	River mile	Address	DEQ PM	egreement directing source	Project status	modified (m-d-v)	contaminent migration	Status of SCE	Major SCE tests to be completed	Schedule for completing SCE		needed		review of SCE decision	sitematives evaluation and schedule (m-v)	Selected SCISe	review of SCM selection decision	completed to date (m-r)	conteminante controlled	activities to be done and achedule (m-v)	completed (m-v)	review of completed SCM	meintenence recuirements
ı													Pathway determination	Perhway priority level	Site priority level	ļ				- (					
	Ollympic Pipeline Portland actity within ExxonMobil	3342	5.2W	8420 NW SI Halana	Heldi Bilachke	ICP	XPA	03/02/08	Stormwater	Ongoing	Dependent upon groundwater conditions	2007	Waiting on SCE to be completed.	to be determined		Waiting on SCE completion, 2007	·								
	Ollympic Pipeline Portland Facility within ExconMobil	3342	5.2W	9420 NW SI Helena	Heldi Blechke	fСР	ХРА	03/02/06	Overweter Activities	N/A	N/A	N/A	N/A ·	none	·	N/A	N/A	N/Ą	N/A	N/A	N/A	N/A	N/A	NIA	N/A
	Ollympic Pipeline Portland Facility within ExxonMobil	3342	5 2W	9420 NW St Helens	Held Blachke	ICP	XPA	03/02/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A .	N/A	N/A	N/A
	BP Terminal 22T (ARCO)	1528	5.3 W	9830 NW St Helens	Tom Gainer	PH Agr for RI/SCM (6/00)	E)	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	rione	p Hi <b>g</b> h	N/A	N/A	NA	N/A	N/A	N/A	N/A	N/A	, N/A	N/A
	BP Terminal 22T (ARCO)	1528	5.3 W	9930 NW St Helens	Tom Geiner	PH Age for RI/SCM (8/00)	Ri	03/06/06	Bank Erosion	N/A	No Bank -concrete see wall	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A .	NA	N/A	N/A
	BP Terminal 22T (ARCO)	1528	53W	9930 NW St Hatena	Tom Geiner	PH Agr for RVSCM (6/00)	Rı	03/06/06	Groundweter	Ongoing	Investigation of GW on adjacent property	Spring 2008	Free product & classified phase potentially reaching river	p High		Waiting on SCE to be completed	sitametives evaluation completed 7/2004 for on also GW	Hydraulic control and GW pump & treat system	SCD submitted to EPA 6/2004, no comments received	Hydraulic Control eystem installed 1/2006	700 linear feet of plume controlled at riverbank		ongoing		effectiveness monitoring
.	BP Terminal 22T (ARCO)	1528	53W	9930 NW St Halana	Tom Geiner	PH Agr for RI/SCAI (6/00)	RI	03/06/06	Stormwater	Ongoing	Sampling stormwater eystern	2008	Waiting on SCE to be completed	to be determined	1	Waiting on SCE to be completed 2006									
`-	BP Terminal 22T (ARCO)	1523	5.3 W	9930 NW St Historia	Tom Gainer	PH Age for RI/SCM (8/00)	Rì	03/06/06	Overwater Activities	NA	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A ·	N/A	N/A	N/A	NA
	BP Terminal 22T (ARCO)	1528	5.3 W	BB30 NW St Hallens	Tom Gelmer	PH Agr for RI/SCM (6/00)	RI	03/06/06	Other	NIA	N/A	N/A	N/A	none		NIA	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A
2	Mex Com Marine (N Parcel)	2360	5.8 €	8790 N Bradford	Mike Romero	PH Agr for RI/SCM (11/01)	ROMA	03/09/08	Overland Transport/Sheet Flow	Completed			overland soil transport euspacied migration pathway	Medium	Medium	EPA reviewed and communited 2004	elternatives evaluation completed in 2004	removal of 20 cubic yards of sandblest git and soft DEQ lause SCD in 5/2004	EPA reviewed and approved 2004	none yel		no current schedule; RP, went bankrupt; potential future owner will conduct source control work.	_		
	Mar Com Marine (N Parcel)	2350	58 E	8790 N Bredford	Mike Romero	PH Agr for RVSCM (11/01)	ROFA	03/09/06	Benk Excelon	Not Started	To be determined	No current echecule	Deferred Investigation to Mar Com South Parcel	to be determined		Watting on SCE to be completed		Deferred Investigation to Mar Com South Percel							
ĺ	Mar Com Marine (N Parcel)	2350	5.8 E	8790 N . Bradford	Mile Romero	PH Agrifor RI/SCM (11/01)	RORA	03/09/06	Groundweter	Completed			Insignificant pathway: no actions recommended	Low		EPA reviewed and commented 2004		N/A							
ſ	Mar Com Marine (N Parcel)	2350	5.6 E	8790 N Beadford	Mike Romero	PH Agr for RVSCM (11/01)	ROMA	03/09/06	Stormester	Completed			Insignificant pathway; no actions recommended	Low		EPA reviewed and convented 2004		N/A							
Ī	Mer Com Merine (N Percel)	2350	5.6 E	8790 N Bradford	Mike Romero	PH Agr for RYSCAL (11/01)	RDRA	03/09/06	Overwater Activities	NA	N/A	N/A	N/A	none		N/A	NZA	N/A	N/A	N/A	N/A	· N/A	N/A	N/A	N/A
_[	Mer Com Marine (N Percel)	2350	56E	8790 N Bradford	Milus Romero	PH Agr for RVSCM (11/01)	RDRA	03/09/05	Other	NA	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
2	Brix Meritime (ake Fose)	2364	5.7 W	903d AW St Helene	Dene Beyuk	PH Agr for RI/SCM (5/02)	Ri	03/07/06	Overland Transport/Sheet	N/A	N/A, site is entirely paved and/or developed	N/A	N/A	nome	to be determined	NIA	N/A	N/A	NIA	N/A	N/A	N/A	N/A	N/A	N/A
· [	Sdx Maritime (ska Fose)	2364	5.7 W	9030 NW Si Helens	Dene Bayuk	PH Agr for RUSCM (502)	RI	03/07/06	Bank Eroeton	NA	N/A, heavily armored with rip-rap, no algorificant hebitat	N/A	N/A	none		N/A ·	N/A	ŅA	N/A	N/A	NIA	N/A	N/A	N/A	N/A
	Brix MacRime (sks Foss)	2364	5.7 W	9030 NW St Helena	Dene Beyuk	PH Agr to RI/SCM (5/02)	RI	03/07/06	Groundweler	Ongoing	Continue monitoring, compile evallable site data for RI and source control decision	2006	Pathway is complete	to be determined		Waiting on SCE to be completed.									
, [	Brix Maritime (aka Foss)	2384	57 W	9030 NW St Helens	Dene Bayuk	PH Agr for RI/SCM (5/02)	RI	03/107/06	Stormwater	NA	Implemented BMPs, storm water permit not required	N/A	N/A	none .		NVA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

= Sheding indicates that upland source control work has been completed

																					<del></del>			<del></del>	
	Cont			nation	rces	of contaminat	ion to the	river			Source Co	ontroi Eva	aluation (S	CE)			•	e Control	Decisions	(SCDs) and	d Status of	Source Con	troi Me	asures (	SCMs)
	Site name	ECELS	River	Address	DEQ PM	Type 87	Project	Date use modified	Potential	Status of	Major SCE tasks to be	Schedule for	Basis for determin		rce control is	Project Status of EPA review of BCE	Source control atternatives evaluation	Selected SCMs	BUMBLE OF EPA	SCM Serivings	guille or volume or	Proposed SCM activities to be done	UAM SCM completed	BUILD OF EPA	Operation and
1			mile			directina source	statue	(m-d-v)	miaration	BCE	completed	completing SCE	Pathway determination	Pethesy priority level	Site priority	decision	and schedule (m-v)		relection decision	(m-v)	controlled	and schedule (m-v)	Im-v1	completed SCM	redulrements
- }	Brix Maritime (alla Foes)	2364	5.7 W	9030 NW St Helens	Dene Bavuk	PH Age for RI/SCM (5/02)	RI	03/07/06	Overwater Activities	N/A	N/A	N/A	No known ourrent sources (spile	nore		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
4	Brix Maritime (ske Fore)	2364	5.7 W	9030 NW St Helens	Dane Bayuk	PH Agr for RUSCM (5/02)	RI	03/07/08	Other	N/A	N/A	N/A	reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TZ	Max Com (S Parcel)	2350	5.0 E	6790 N , Bradford	Mike Romero	Negotiating PH Agr	Rı	¢3/09/06	Overland Transport/Sheet Flow	Ongoing	Overland flows down concrete shipway and across large unpaved site areas need to be investigated	2008	Waiting on SCE to be completed	lps to a cleanershined	to be determined	Walting on SCE to be completed in 2006					<u> </u>				
	Mai Com (8 Parcel)	2350	5.0 E	8790 N Bradford	Mike Romero	Negotiating PH Agr	Ri	03/09/08	Bank Erosion	Ongoing	Investigation must include North Parcel bank and beach	2008	Waiting on SCE to be completed	to be determined		Welting on SCE to be completed in 2006									
- [	Mar Com (8 Parcel)	2350	58 E	8790 N Burgard	MAs Romero	Negotieting PH Agr	R)	03/09/08	Groundweter	Ongoing	Need to determine N&E in	2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed in 2006									
1	Mar Com (S Parcel)	2350	5.8 E	8790 N Bradford	Mile Romero	Negotiating PH Agr	ŔI	03/09/06	Stormweter	Ongoing	Need to determine N&E in R1	early 2007	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed in 2008		-							
	Mar Com (S Parcel)	2350	5.8 E	8780 N Bradford	Mika Romano	Negotating PH Agr	Ri	03/09/06	Overvister Activities	Ongoing	Need to complete N&E in RI; refers to historic overwater activities	2006	Waiting on SCE to be completed	to be deterrined		Waiting on SCE to be completed in 2006		Floating dry dock sold in 2004, and removed from site.							
$\sqrt{}$	Mar Com (9 Parcel)	2350	5.8 E	8790 N Bradford	Miles Romero	Negotiating PH Agr	RI	03/09/08	Other	N/A	NIA	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
72	Medice Firence	2552	6.8 W	ATT HANGE	Mark Pugh	PPA	ROPA 11	00/03/06	Dyerland Transport/Shaot Flow	Compliated			contaminated over according criteria in soil potentially susceptible to runoff	Low	Low	SCE subrished to EPA 9/30/04, No comments received.	atumethree evaluation completed 2004	Olg and feat coll contemination: capping with clear ill ancies building	SCM submitted to EPA 9/2004, no comments received	Boil removed DBJO6; selected allo enter capped with building artifus clean BB	1,190 cuitic yertle of ecil removed (settinified); report pending	contrasta, report peristing		SCM completion report pending: epring 2007	instructual control for cap- and building will be required.
ſ	Marine Finance	2352	8.8W	BAGA NAVI GI ) Isolana	etara Paga	PPA.	PORA	63/03/09	Berk Erseken	Completed.		- (***)	ireignificant pathway; no actions recommended	Low		SCE automitted to EPA 9/30/04, No comments received.	atternatives evaluation completed 2004	No SCA resded	an 1944	Harafa (1)					
	Marine Pinance	2962	5.8 W	6444 NW St. Hatory	Mark Pugh	illi partiti	RDRA	03/03/08	Groundwater	Completed			Insignificant pathway no actions recommended	LON.	101	SCE submitted to EPA 9/30/04. No comparts received.	eternatives overliebon is completed 2004	No SCM needed	i de la companya da series de la companya de la com		Marinana. Parinana	19 d			. 10
	Marine Pleases	2363	5.8 W	Bass NWSt Habita	Mark Post	PPA -	ROMA	03/03/06	8	•		N/A	No current system; new system to be installed. PPA requires 1 year of nontioring	plow				No current system; beer system to be installed, PPA requires 1 year of 1/4ly monitoring.		\$ ±		Storm drain system to be inscalled by spring/surrorer 2008; thickness 5 storm veter stempling prograp will be required following:		BCM completion report pending; spring 2007	
	Marina Finance	2362	5.8 W	SLAANW D. Halana	Mark Pugh		RDRA	03/03/06	Dvarvetsu Activities	NA I	NA.	N/A	Na known current nources (spills reported to OERS)	norie		N/A	NUA	le I MA	144	NA.	NA.	N/A	NA	NIA	NA
$ \sqrt{} $	Marine Pinance	2552	0.544	8444 NW Bi Helens,	Mark Pugh	PPA	ROPA	03/03/06	Other	NZA	NATION AND ADDRESS OF THE PARTY	N/A	NA	.mgre		i ii	I I NA [1]	N/A	NIA	N/A	NA III	HÍÁ	N/A	NA.	UNIA
TI	US Moorings	1641	6.2	8010 NW St. Helinna Rd.	EPA leed, Kristine	AOC	Rti	03/15/08	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	NIA	NIA	N/A	N/A	N/A	N/A	N/A
1	US Moorings	1541	0.2	BO1D NW St. Halone Rd.	EPA land. Kristina Kodh	лос	RI	03/15/06	Bank Erosion	Ongoing		2007	Walting on SCE to be completed	to be determined	]	Waiting on SCE completion, 2007									
	US Moorings	1641	6.2	6010 NW St. Heims Rd.	EPA lead, Kriedne Koch	AOC	RI	03/15/08	Groundweter	Ongoing		2007	Waiting on SCE to be completed	to be determined		Waiting on SCE completion, 2007									
	US Moorings	1641	8.2	8010 NW SL Helene Rd	EPA lead; Kristine Koch	AOC	RI	03/15/08	Stormwater	Ongoing		2007	Weiting on SCE to be completed	to be determined	]	Waiting on SCE completion, 2007			<u> </u>			•	ļ <u>.</u>		· .
1.	US Moorings	1541	8.2	8010 NW St. Hallens Rd.	EPA lead; Kristine Koch	AOC	RI	03/15/06	Overwater Activities	Ongoing		2007	Waiting on SCE to be completed	to be determined	]	Weiting on SCE completion, 2007							<u> </u>		
4	US Mootings	1841	62	8010 NW St. Halens Rd.	EPA lead: Krietine Koch	AOC	RI	03/15/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	NA	N/A	N/A '	N/A	N/A	N/A	N/A'

= Shading indicates that unland source costrol work has been completed.

Γ	Confi	trmed o	or suape	eted SOL	ILCES	of contaminati	ion to the	rtver			Source Co	ontrol Eva	aluation (S	CE)			Source	e Control	Decisions	(SCDs) and	Status of	Source Con	trol Me	asures (S	SCMs)
			infort						· 							Projec	t status								
ſ	Elte name	fical s	River mile	Address	DEQ PM	Type of Agreement directing source	Project status	modified (m-d-v)	Potential contaminant migration	Status of SCE	Mizjor SCE tasks to be completed	Schedule for completing SCE		needed		review of SCE decision	Source Control alternatives evaluation and achedule (m-v)	Selected SCIAs	review of SCM selection decision	completed to date	RELEA OF VOIDING OF continuinents controlled	activities to be done and schedule (m-v)	DAIS SCH completed (m-v)	review of completed BCM	restrienance reculrements
											,		Pathway determination	Pethwey priority level	Site priority level									Ì	
2	Crawford Street Corp	2363	6.3 E	84248 N Crewford	Tom Gelner	PH Letter Agr for XPA (11/99)	'XPA	03/06/06	Overland Transport/Sheet Flow	Ongoing	See Stormwater Pathway	No current schedule	Walting on SCE to be completed	to be determined	to be determined	Watting on SCE completion									
	Crawford Street Corp	2363	63E	84248 N Crawford	Tom Gahar	PH Letter Age for XPA (11/89)	хра	03/08/06	Benk Erosion	Ongoing	To be determined	No current achedule	Weiting on SCE to be completed	to be determined		To be determined		RP removed black sand from beach and beak in 10/01. Résiduel contamination exters on beach. Bank was replaced with clean fill.							
	Crawford Street Corp	2363	0.3 E	84248 N Crewford	Tom Gainer	PH Letter Agr for XPA (11/99)	ХРА	03/08/08	Groundweter	Completed		-	insignificant pathway; no actions recommended	Low		Walting on SCE completion									
	Crewford Street Corp	2363	6.3 E	84248 N Crewford	Tom Gainer	PH Letter Agritor XPA (11/99)	хра	03/06/08	Storrweter	Ongoing	Additional monitoring needed	No current achedule	Weiting on SCE to be completed	to be determined		Waiting on SCE completion		:						_	
	Creatord Street Corp	2363	53E	84248 N Crewford	Tom Geiner	PH Letter Agr for XPA (11/99)	ΧРΑ	03/04/08	Overester Activities	N/A	N/A	N/A	N/A	nome		N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A	NA
<b>V</b>	Crawford Street Corp	2363	6.3 €	84248 N Crewford	Tom Geiner	PH Letter Agr for XPA (11/99)	ХРА	03/06/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	NVA	N/A	N/A	N/A	N/A	N/A	N/A	N/A
77	Gasco (NW Natural)	84	64W	7900 NW St Helens	Heid Stachka	Pre-PH VCP Agr for RVF8 (8/94)	RI	03/06/06	Overtand Transport/Sheet Flow	N/A	N/A	NIA	N/A	none	High	N/A	N/A	N/A	NIA	N/A	NIA	N/A	N/A	N/A .	N/A
ijŀ	Gasco (NW Natural)	84	84W	7900 NW St Helene	Heid Blachke	Pre-PH VCP Agr for RVFS (8/94)	RI	03/08/06	Bank Erosion	Ongoing	Coordinate Bank Source Control with anticipated in- water action	To be determined	Perthwey is complete	p High		Welting on SCE to be completed.	_			-					
	Gesco (NW Natural)	84	8.4 W	7900 NW St Helens	Held Bäschke	Pre-PH VCP Agr for RVFS (8/94)	RI	03/06/08	Groundwater	Completed		_	Patheray la complete	High		Walting on SCE to be completed.	Fleid Pilot 2008/Source Control Albertatives Evaluation March 2007								
11	Gasco (NW Natural)	84	04W	7900 NW St Helene	Heid Blackka	Pre-PH VCP Agr for RVFS (8/94)	Ri	03/06/06	Stermenter	Ongoing	Complete stormerater system evaluation and sampling	Winter 2006	Pethway is complete	to be determined		Waiting on SCE to be completed									
	Geeco (NW Natural)	84	64 W	7900 NW SI Hallens	Hekd Blact-ke	Pre-PH VCP Agr for RVFS (\$194)	Ri	03/06/08	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	nane		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<u> </u>	Gescu (NW Natural)	84	6.4 W	7900 NW St Helana	Heid Blechke	Pre-PH VCP Agr for RVFS (8/94)	RI	03/06/06	Other NPDES Permit	Ongoing	Review draft permit standards	July 2006	Pethway is complete	to be determined		Welting on SCE to be completed.					_				,
•	asco/Silironi o Corp.	183	6.6 W	7700 NW Front	Hekd Blactika	Joint Order NW Natural and Wacker Siltronic (10/00)	RI	03/13/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	• N/A	none	High	N/A	N/A	N/A	N/A	N/A	N/A	. N/A	N/A	N/A.	N/A
	ascorSitroni a Corp.	183	6 6 W	7700 NW Front	Held Blachka	Joint Order NW Natural and Wacker Sittonic (10/00)	RI	03/13/06	Bank Erosion	Ongoing	Additional investigation and executivent	Winter 2008	Waiting on SCE to be completed	to be determined		Welting on SCE to be completed						,			
G	lesco/Silbroni c Corp.	183	6.6 W	7700 NW Front	Hekil Blachke	Joint Order NW Natural and Wacker Silbronic (10/00)	Ri	03/13/08	Groundwater	Completed	Upland evaluation for manufactured gas plant waste is orgoing to support SCM alternatives evaluation		Pathway is complate	High		Watting on SCM sitematives evaluation to be completed, 2007	Field Pilot 2006/Source Control Alternatives Evaluation March 2007	,							
G	lesco/Siltroni c Corp	183	5 6 W	7700 NW Front	Heid Blachke	Joint Order MW Netural and Wacker Siltronic (10/00)	Ri	03/13/06	Stormwater	Ongoing	Complete formel energies of earnpling results.	Fall 2008	Wating on SCE to be completed	pLow		Weiting on SCE to be completed, 2005									
6	ie sao/Sitroni c Corp.	183	5.5 W	7700 NW Front	Heid Blischke	Joint Order NW Netural and Wacker Siltronic (10/00)	Ri	03/13/06	Overwater Activities	N/A	N/A	N/A	NA	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
G	ascorSitorni c Corp	183	00W	7700 NW From	Hekš Blechke	Joint Order NW Natural and Wecker Sitronic (10/00)	RI	03/13/08	Other (DUAPI) Crauk	Ongoing	Doene creek investigation ongoing	Summer 2008	Pathway is complete	p Med		Waiting on SCE to be completed, 2006									

10 of 2

Shading indicates that upland source control work has been completed.

	Conf	irmed o	r suspi	ected SOL	irces	of contaminat	lon to the	river	· ·		Source Co	ontrol Eva	luation (S	CE)			Sourc	e Control	Decisions	(SCDs) and	Status of	Source Con	trol Me	asures (S	SCMs)
	· · ·	Site	infor	mation													t status								
	Site name	ECSI #	River mile	Address	DEQ PM	Type of agreement directing source	Project status	medified (m-d-v)	contaminant micration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE		needed		Status of EPA review of SCE decision	Source control afternatives evaluation and schedule (m-v)	Belected SCHs	etallis of EPA review of SCM selection decision	SCM Scovilled completed to date (m-v)	mises or volume or contaminants controlled	activities to be dense and achedule (m-v)	DELETCH completed (m-v)	SUBJE OF EPA review of completed SCM	Operation and maintenance regul/ements
	ļ												Pathway determination	Petrwey priority level	Site priority level		l		i						
	Gasco/Sitroni c Corp	183	8 8 W	7700 NW Front	Heid Blackte	Joint Order leased to NW Natural and Wacker Siltronic (10/00)	RI	03/13/06	Other- MPD65 pa-mst 1	Completed			Pathway is complete	Low		Waiting on SCE to be completed, 2006				:					
72	Siltronic Corp. TCE Investigation	183	6.5 W	7200 NW Front	Dane Bayuk	VCP Order (2/04)	RI	03/07/06	Overland Transport/Sheet Flow	N/A	N/A, subsurface releases from UST system	N/A	N/A	rone	p H <b>ig</b> gh	N/A	N/A	NA	N/A	N/A	HIA	N/A	NIA	N/A	N/A
{	Sitronic Corp. TCE Investigation	183	8.5 W	7200 NW Front	Dene Bayuk	VCP Order (2/04)	RI	03/07/06	Bank Erceton	N/A	N/A, subsurface relations from UST system	N/A	N/A	none		N/A	N/A ·	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Silinonic Corp TCE Investigation	183	w.s	7200 NW Front	Dene Beyuk	VCP Order (2/04)	RI	03/07/06	Groundwater	Origina	Continued groundwater monitoring	Complete RI, prepare adurce control decision, 2008	Pedrovey is complete	р <b>Нigh</b>		Waiting on SCE to be completed	Enhanced bionemediation pilot study in preliminary planning phase								
}	Sëtronic Corp. TCE Investigation	183	8 S W	7200 NW Front	Dene Beyuk	VCP Order (2/04)	RI	03/07/06	Stormwater	Origoting	Site storm water system evalution, including data compilation & sampling in and around piping	2008	Contaminated river sediments near northern facility outsid (Aree 2)	to be determined		Waiting on SCE to be completed									
	Sitronic Corp. TCE Investigation	183	6.5 W	7200 NW Front	Derm Beryuk	VCP Order (2/04)	RJ	03/07/06	Overwater Activities	N/A	N/A	N/A	N/A ·	none,		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<u>V</u>	Siltronic Corp. TCE Investigation	163	6.5 W	7200 NW Front	Darre Bayuk	VCP Order (2/04)	RI	03/07/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A
TI	Willemeta Cove	2066	9 A B	Foot of N Edgewater	Kavin Parrett	PH Agr for RVSCM (11/00)	æ	03/09/06	Overland Transport/Sheet Flow	Completed			Insignificant pathway; no actions recommended	Low	to be determined	Weiting on SCE to be completed, spring 2006									
.1	Williamette Cove	2066	6.8 E .	Foot of N Edgewater	Kevin Parrett	PH Agr for RI/SCM (11/00)	RI	03/09/06	Benk Eroelon	Ongoing	Complete bank sampling	Spring 2006	Suspected migration pathway	to be determined		Waiting on SCE to be completed, spring 2006	-								
	Willemette Cove	2066	68 E	Foot of N Edgewater	Kevin Parrett	PH Agr for RVSCM (11/00)	RI	03/09/06	Groundwater	Orgoing	Continue groundwater monitoring	Spring 2006	Suspected migration pathway	to be determined		Welting on SCE to be completed, spring 2008									
	Witamette Cove	2086	08E	Foot of N Edgewater	Kevin Perrett	PH Agr for RI/SCM (11/00)	RI	03/09/06	Stormwater	Ongeling	Evaluate potential pri-elte atom drains	2008	Suspected migration patienty	to be determined		Waiting on SCE to be completed, epring 2006	`								
-	Willemette Cove	2088	68 E	Fact of N Edgewater	Karein Perrett	PH Agr for RI/SCM (11/00)	RI	03/09/06	Overwater Activities	N/A	N/A	N/A	No current equirue; likely historic sources	none		N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A	N/A	H/A
业	Willemette Cove	2066	68 E	Foot of H Edgewater	Kevin Parrett	PH Agrifor RVSCM (11/00)	RI	03/09/08	Other - in river (I-thirch area (-in)505/d)	Completed			Suspected migration pathway	Medium		EPA reviewed and commented	afternatives evaluation completed 2004	Source removal completed in river 10/2004	deferred to in-wetter RI						
TI	Rhone Poulenc	155	69W	6200 NW St Helens	Tom Roks	Pre-PH Order for RJ (1999)	RI .	03/07/08	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	£	N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A
. 1	Rhone Poulenc	155	6.9 W	6200 NW St Helene	Tom Roick	Pre-PH Order for Rt (1998)	RI	03/07/08	Bank Erosion	N/A	NIA	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Rhone Poulenc	155	69W	6200 NW St Hellers	Tom Roick		Ri	03/07/08	Groundweter (plume discherge to river)	Ongoing	SCE Technical Memorandum to be aubmitted	SCE Technical Memorandum due 5/08	Pathway is complete	p Hägh		Waiting on SCE so be completed, spring 2008									
	Rhone Poulenc	155	59W	6200 NW St Historie	Tom Rokk	Pre-PH Order for RJ (1998)	RI	03/07/06	Groundwater (plume discharge to City Outfail 228)	Completed			Pathway is complete	High				Interim SCM to seed storm water line to prevent infiltration				,			,
1	Rhone Poulenc	155	6.9 W	8200 NW St Hellens	Tom Rolck	Pre-PH Order for Rt (1999)	RI	03/07/06	Storrwater	Ongoing	City Outball 228 & 22C storm drain evaluations	Pending GW SCM for 228	Weiling on SCE to be completed	p Med	-	Waiting on SCE to be completed, epring 2006									
- 1	Rhone Poulenc	155	8.9 W	8200 NW St Helene	Tom Roks	Pre-PH Order for RI (1999)	RI	03/07/06	Overweter Activities	N/A	N/A	- N/A	N/A	none		N/A	N/A	ŅA	NA	, N/A	, NIV	N/A	N/A	N/A	N/A
·	Rhone Poulenc	155	***	6200 NW St Helens	Tom Rolok	Day 041 044 144	RI	03/07/06	Other - historical drainage ditch	Ongoing	Complete remedial investigation	SCE Technical Memorandum due 5/06	Waiting on SCE to be completed	p Med		Waiting on SCE to be completed, spring 2006									

Shading indicates that upland source control work has been completed.

[	Conf	irmed c	or augo	ected SOI	ILCOS	of conteminal	ion to the	river			Source Co	ontrol Eva	aluation (SC	CE)			Source	e Control	Decisions	(SCDs) and	d Status of	Source Con	rol Ma	aguree /	SCMe)
	2311			mation					•					,			t status						51 1816		,
	Site name	ECSI #	River	Address	DEQ PM	1958 67 agreement directing source	Project status	modified (m-d-v)	potential conteminant mioration	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCE	Basis for determina	ntion that equi needed	ce control la	review of SCE decision	alternatives evaluation and echedule (m-v)	Selected SCMs	review of BCM selection decision	Completed to date	contaminants  controlled	scivities to be done and achedula (m-v)	completed (m-r)	review of	maintenence
ł			1										Pathway determination	Pathway priority level	Site priority level							1			
	Phone Poulenc	155	6.9 W	6200 NW St Halans	Tom Rokok	Pru-PH Order for RI (1999)	Ru	03/07/08	Other - current NPDES permitted discharge	Origoing	To be determined	No current achedule	Waiting on SCE to be completed	to be determined		Walting on SCE to be completed.									
1	ácCormicis & Bexter	74	7	6900 N Erigewater Street	Kevin Perrets	Superfund Sgreenerit with EPA	remedy Implemente d	03/09/08	Overland Transport/Sheet Flow	Completed	,		Pathway is complete	High	High	Complete		conterminated and removal, sheat-pile better well, sediment cap, riperian and cap, upland and cap, oranseste extraction		all SCMs have been implemented	8,000 gallons of creacts recovered from groundwester. 33,000 toms of contaminated soil and datafia removed, 23 acres of contaminated bank soil capped, 8 acres of contaminated bank soil capped, 3 acres of contaminated upland soil capped			EPA reviewed and commented.	partodic Inspection and maintenance, offschemes mortoring, size use restrictions
	AcCornick & Baxter	74	7	6900 N Edgewater	Kevin Parrett	Superfund agreement with EPA	remedy Implemente d	03/09/06	Bank Erosion	Completed			Pethway la complete	High		Complete		;		İ				EPA reviewed and commented.	
Ī	AcCormick & Bexter	74	7	Street 8900 N Edgewater	Kevin Perrett	Superfund agreement with EPA	remedy Implements d	03/09/08	Groundwater	Completed			Pethwey is complete	High		Complete								EPA reviewed and commented.	Í
1	dcCorrect & Baxter	74	,	Street 6900 N Edgewater Street	Kavin Perrett	Superfund agreement with EPA	remedy Implemente d	03/09/06	Stormweter	Completed	-		Pathway is complete	High		Complete								EPA reviewed and commented.	
1	AcCorrect & Baxter	74	7	8900 N Edgewater Street	Kevin Perrett	Superfund Agreement with EPA	remedy Implemente d	03/09/08	Overwater Activities	Completed			Pathway is complete	High		Complete								EPA reviewed and commented.	
$\sqrt{ }$	McCorreich & Beuder	74	7	6900 N Edgewater Street	Kevin Pemiti	Superfund egreement with EPA	remedy Implemente d	03/09/08	Other	N/A			N/A	none		N/A	N/A	N/A ,	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Kappere Inc	2348	,	7540 NW St. Helens Rd.	Hekil Blachke	Part of NW Natural Gesco she; see ESCI			Overland Transport/Sheet Flow								·								
t	Koppere Inc	2348	7	7540 NW SL Helana Rd	Held Blechke	j			Bank Erosion																
[	Koppere Inc	2345	7	7540 NW SL Hetere Rd 7540 NW SL	Heid Blackte Heid	<u> </u>			Groundweter									<u> </u>							
ŀ	Koppers Inc	2348	1	7540 NW St	Blachke	l			Stormwater							<u> </u>				_					
ŀ	Koppere Inc	2348	+-	Helens Rd. 7540 NW St. Helens Rd.	Bhrite				Activities .																
Ī(	Arkema	398	72W	Helens Rd. 5400 NW Front	Mers McCincy	Pre-PH VCP Formal Agr for RVFS (9/98)	RI	03/06/08	Groundwater (c) high benzium DDT (flume)	Ongoing	Source control evaluation in preparation	2006	Pethwey is complete	p High	p H <b>ig</b> h	Weiting on SCE completion	schedule for completing draft evaluation rapor, fell 2007	Final SCM TBD Interim SCM AS/SVE system in-elbu chemical oxidation	EPA reviewed and commented on Interim SCM (April 2005)	Interim SCMs include AS/SVE system, instead in- altu chem-cu treatment					
	Arkema	398	72W	8400 NW Front	Matt McClincy	Pre-PH VCP Formal Agricor RI/FS (9/96)	RI	03/06/08	Geometra Classical (destrojed	Ongoing	Source control evaluation in preparation	2008	Pethway is complete	p High		Walting on SCE completion	echedule for completing draft evaluation repor, fall 2007	Final 8CM TBD Interim SCM in-ellu celcium polyeulfide Ireelmeni underway	EPA reviewed and commented on interior SCM (April 2005)	Interim SCMe Include in-elfa catolum polysulfice treatment					
	Arteme	398	7.2 W	6400 NW Front	Matt McClincy	Pre-PH VCP Formal Agr for RUFS (9/98)	RI	03/06/06	Groundwater (r) echtorate -hourre	Ongoing	Source control evaluation in preparation	2008	Pathway le complete	p High		Waiting on SCE completion	echedule for completing draft evaluation repor, fell 2007	Final SCM TSD proposed field pilot expected early 06		None					
/ [	Arkema	398	7.2 W	6400 NW Front	Matt MsCBncy	Pre-PH VCP Formal Agr for RWFS (B/98)	Ri	80/80/20	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	Mone		N/A	N/A	N/A	N/A	N/A	N/A	. N/A	N/A	N/A	N/A
	Adversa	398	72W	8400 NW Front	Mett McClincy	Pre-PH VCP Formal Agrifor RUFS (9/98)	RI	03/D6/06	Bank Erosion	Ongoing	define boundaries of Contaminated bank material	To be determined	River Bank soli contaminant levels exceed action levels	p High		Anticipate integrating with EPA in-water early action process	schedule for completing draft evaluation report 09/07	Timing of SCM to be coordinated with EPA early action		None			_		
	Arkeme	398	7.2 W	8400 NW Front	Meti McCincy	Pre-PH VCP Formel Agrifor RMFS (998)	RI	03/06/06	Stormweter	Origoing	Evaluate existing sampling data	2006	Contaminents in stormwater exceed screening values (AWQC)	p Hiligh		EPA review deferred to review of selected SCM	schedule for completing draft evaluation report 05/06	Final SCMs to be determined		interim SCMs include BMPs, surface soil removate and surface soil caps					
	Artems	398	7.2 W	6400 NW Front	Matt McClincy	Pre-PH VCP Formal Agrifor RNFS (998)	RI	03/05/06	Overwater Activities	N∕A	N/A	N/A	N/A	Mone		N/A	NIA	N/A	N/A	N/A .	NIA	N/A	NIA	N/A	N/A

Entransacion indicates that unland enums control work has been completed Confirmed or suspected SOUFCES of contemination to the river Source Control Evaluation (SCE) Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs) Site information Project status Source control
alternatives evaluation Major BCE Insks to be NUMBER OF EPA Trimution Stati am wee control in review of SCM activities to be don review of maintenance Pathway Site priority priority level (evel Patroney 398 7.2 W 8400 NW Fro monun AI/A Other MIA M/A N/A NA N/A N/A N/A .... PH Age for RUCSM (3/00) Overland shapon/She Flow to be 03/06/06 NA N/A N/A N/A N/A N/A N/A NIA N/A N/A N/A none Presiminary marringtion that RP is conducting RI to determine if SCMs are needed on the bank PH Agr for RUCSM (3/00) Waiting on SCE 7.4 W 6550 NW Fro mnene Bart Emeira Ongoing alting on SCE to be completed PH Agr for RVCSM (3/00) Walting on SCE 134 7.4 W 5550 NW From 03/06/06 McCed Oil RI General territory 2004 Yating on SCE to be completed Walting on SCI to be complete McCall Oll Ongoing PH Agr for RUCSM (3/00) McCall Of PH Agr for RVCSM (3/00) N/A MaCall Oil 03/06/04 N/A N/A Other N/A SOW under VCP - PH Agr Pending ang on SCE to b XРА 00/09/08 A complete; RI and SCE to be intrinsed Walting on SCE to be completed Onnoine 7.8 W 8350 NW From VCP - PH Agr XPA 03/09/08 Bank Erceton (PA complete, R) and SCE. faiting on SCE to be completed Waiting on SCE Onacina velopment. 2006 SOW under Watting on SCI to be completed (PA complete, Rt and SCE to be intend 7 5 W 8350 MW Fron XРА 03/09/06 Oroundents Ongoing 2006 SOW under VCP - PH Agr Pending Waiting on SCE to be completed KPA complete; RI and SCE to be intisted iting on SCE to be 7 5 W 8350 MW From 117 XPA CONTRACTOR 7.5 W 8350 MW Fro munem N/A N/A N/A N/A N/A GS Roofing 7.5 W 8350 NW From XPA 03/09/05 Other N/A N/A N/A N/A N/A NA none N/A N/A -Din & head soil hot Proposed SCM to EPA 9/04; Received comments 12/04; DEQ responded to Contaminated and entrained in stormwater & sheatflow Dig & haut soil hol op & ICON/ECON Federated 820cv o be intered after -acil deamup anacipated to be initiated in '97 after property sale 277 7.5 E 5828 N Van soil will be removed 5,100sy of surface capped Triangle Park Pre-PH PPA for RD / RA 03/10/08 to be EPA reviewed Madem Dig & hauf soil ho spots & ICON/ECOI -soil deamup anticipated to be intosted in '07 after property sale' A portion of the estimated 820cy of soil to be removed 5 5,100ey of surface capped is in the ban area Proposed SCM to EPA 9/04; Receiver comments 12/04; DEQ responded to comments 2/05 SCHe anticipated be initated after panding property transaction is complete (2007) 5828 N Van Houten F8 03/10/06 5828 N Van Houten Triangle Park (N POX Yard) Dana OEQ Leed Imphen Accoun attning on SC completion NA 277 7.5 E RI 03/10/06 Ongoing May 2006 Pathway is complet **Groundwette** Proposed SCD to EPA 9/04; Received comments 12/04; DEO A portion of the assimated 8,20cy of soil to be removed & 5,100ey of surface cuppped is in the bank -Dig & head coll ho pots & ICON/ECO SCMe anticipated in the instanted effect pending property transaction is complete (2007) -Dig & hauf soil hot spot & ICON/ECON -soil cleanup enticlpited to be initiated in 107 after -soil cleanup enticipated to be intleted in '07 afte 7e-P14 PPA for RUFS (5/97) entreined in EPA review completed 12/04 277 7.5 E F5 03/10/06 Medium and commenter 12/2004 responded to organism 2/0 5828 N Ven ,Sm enebo

N/A

N/A

N/A

INATIVITY = Shading indicates that upland source control work has been completed.

	Confi	_			ırces	of contaminati	on to the	river			Source Co	ontrol Eva	aluation (SC	CE)			Sourc	e Control	Decisions	(SCDs) and	Status of	Source Con	trol Me	asures (	SCMs)
ŀ			_	mation		TYPE OF		DAYS USAT	PROMINGE	Status of	Major SCE tests to be	Schedule for	Basis for determin	ation & at a second		Project	Source candle		BILLOU BY EPA	SCM SCOVIDES	MANE OF VOLUME BY	PROCESSOR SICILI	T DAM BOM	BILLUI OF EPA T	ODERWISH AND
ı	Site name	ECSI #	River	Address	DEQ PM	agreement directine source	Project etchie	modified	centerninant nvioration	SCE	completed	completing SCE	ļ	needed		review of BCE decision	and schedule (m-v)	Selected SCIIIs	review of SCM selection decision	completed to date (m-v)	controlled :	activities to be done and schedule (m-v)	completed (m-v)	review of completed SCM	maintenance reculrements
											·		Pathway determination	Pethway priority level	Site priority level								1		
	itangle Perk N PDX Yard)	277	7.5 E	5828 N Ven Houten	Jim Anderson	Pre-PH PPA for RVF5 (5/97)	FS	03/10/06	Other - Petroleum pipeline enters at south end of site from beneath the river	Completed	·		inelgräficent pethwey: no actions recommended	Low		EPA reviewed and commented				`					
1	Gould Electronice, Inc atta GA- TEK	40	7.5W	5909 NW 61st Ave	EPA lead, Chip Humphrey	EPA Consent Decree		03/15/06	Overtand Transport/Sheet Flow	N/A	N/A	N/A	N/A	hone	p High	N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A
	Gould Electronics, Inc site GA- TEK	49	7.5W	5909 NW 61st Ave	EPA leest. Chip Humphrey	EPA Consent Decree	_	03/19/06	Bank Erosion	N/A	N/A	N/A	N/A	name		N/A	N/A	N/A	N/A	N/A	N/A	N/A '	N/A	N/A	N/A
	Gould Electronics, Inc situs GA- TEX	40	7.5W	5909 NW 61st Ave	EPA lead; Chip Humphrey	EPA Consent Decree		03/15/08	Groundwater	Completed			Insignificant pathway; no actions recommended	Low		EPA insued groundwater NFA based upon risk assessment		No SICM needed						EPA lead	
	Gould Electronics, Inc siks QA- TEK	49	7.5W	5909 NW 61st Ave	EPA lead; Chip Humphrey	EPA Consent Decree		03/15/08	Groundwater/City Storm Sawer	Ongoing	TBD, storm sewer appears to be preferential pathway for contaminent migration	to be determined	Pathway la complete	p High	!	EPA had		:							
	Gould Electronice, Inc alta GA- TEK	. 49	7.5₩	5909 MW 61st Ave	EPA lead; Chip Humphray	EPA Consent Decree		03/15/08	Stormwater	Completed			Historically pathway added Current discharge Insignificant pathway, no actions recommended	Low		EPA lead		1) Contaminated soli removal and containment (swolid); 2) Sedment removal; 3) RCRA waste containment; 4) Removed weste poind 5) O&M ongoing		,				EPA lead	·
	Gould Electronics, Inc alus GA- TEK	49	7.5W	5909 NW 61st Ave	EPA tead: Chip Humphrey	EPA Consent Decree		03/15/08	Overwater Activities	N/A	NA	N/A	N/A	none	ļ	NIA	N/A	kvá	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Gould Electronics, Inc atle GA- TEK	49	7 SW	5909 NW 61st Ave	EPA lead: Chip Humphrey:	EPA Consent Decree		03/15/06	Other - Historic and Current NPDES permit	Completed			Historically pathway existed. Current discharge Insignificant pathway; no actions recommended	Low •		EPA lead		Removed waste pond (East Doane Lake); O&M ongoing				-	-	EPA load	·
, [	Withday (Kinder Morgan, Chevron, Conoco Philips)	1549	7.7 W	Front Ave & NW Doarse	JII Klemen	Pre-PH Consent Order (3/94)	FS	03/14/06	Overland Transport/Sheet Flow	Completed			Insignificant pathway; no actions recommended	Low	High	Submitted to EPA fell 2004; no comments		No SCM needed						N/A	
$\Big  \Big[$	Wilbridge (Kinder Morgan, Chevron, Conoco Philips)	1549	7,7 W	Front Ave & NW Ocene	Jil Klemen	Pre-PH Consunt Order (3/94)	FS	03/14/06	Benk Erosion	Completed			ineignificent pathway; no actions recommended	Low		Submitted to EPA fall 2004; no comments		No SCM needed	,					N/A	
	Wilkindge (Kinder Morgan, Chevron, Conoco Phillips)	1549	7.7 W	Front Ave & NW Doane	Jill Kjernan	Pre-PH Consent Order (3/94)	FS	03/14/06	Groundweter	Completed			GW suspected regustion pathway	High		Submitted to EPA tell 2004; no commente	no alternatives evaluation needed	Product recovery & hydraufic containment (sheet pile well)	Proposed 6CM submitted to EPA fell 2004; no comments	hydraulic contaminant and treatment		containment system to be installed in summer 2005			
	Wilbridge (Kinder Morgen, Chevron, Conoco Philips)	1549	7.7 W	Front Ave & NW Doese	JE Kleman	Pre-PH Consent Order (3/94)	FS	03/14/06	Stormestar	Ongoing	Apply stormwater guidance to assess pathway	Fall 2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed.									
	Wilbridge (Kinder Morgan, Chevron, Conoco Philips)	1549	7.7 W	Front Ave & NW Doans	,81 Klemen	Pre-PH Consent Order (3/94)	FS	03/14/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spits reported to OERS)	hame		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

= Shading indicates that upland source control work has been completed

_	Confirmed or suspected SOUICOS of contamination to the river					опроша.																			
	Confi				urces	of contaminat	ion to the	river .	]		Source Co	ontrol Eva	luation (SC	E)			Sourc	e Control	Decisions	(SCDs) and	d Status of	Source Con	rol Me	asures (S	SCMs)
		Site	infor	mation												Project									
1	lite name	ECS: 6	River mle	Address	DEQ PM	rype by agreement directing source	Project straus	modified (m-d-v)	contuminent micration	Status of SCE	Major SCE teaks to be complated	Schedule for completing SCE		needed		Status of EPA review of BCE decision	source control alternatives evaluation and achedule (m-v)	Selected SCMs	STAILUI OF EPA review of SCM selection decision	scalectivities completed to date (m-v)	mass of volume of contamenants controlled	activities to be done and schedule (m-v)	oompleted (m-v)	STATUS OF EPA review of completed SCM	Operator and maintenance requirements
L			Ш					<u> </u>					Patherey determination	Petrusy priority level	Site priority level										
	Withridge (Kinder Morgan, Chevron, Conoco Philips)	1549	77W	Front Ave & NW Doene	At Keman	Pre-PH Consens Order (3/94)	F8	03/14/08	Other	N/A	N/A	NIA	N/A	none		N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A	N/A	N/A
?[	Chevron Asphalt	1291	8.0 W	5501 NW Front	Murk Pugh	PH Letter Agr for XPA (1/03)	ХРА	03/03/06	Overtend Transport/Sheet Flow	N/A	N/A	N/A	N/A		p Med	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
٠Г	Chevron Asphalt	1281	8.0 W	5501 NW Fron	Mark Pugh	PH Letter Agr for XPA (1/03)	ХРА	03/03/06	Bank Eroelon	N/A	N/A	N/A	N/A			N/A	N/A	NA	N/A	N/A	ALM	N/A	N/A	N/A	1 N/A
	Chevron Asphalt	1281	80W	5501 NW Front	Mark Pugh		хРА	03/03/06	Groundwater	Ongoing	XPA fieldwork complete; DEG provided comments for source control screening; revised report due spring 2005	epring 2007	Waiting on SCE to be completed	p Low		Walting on SCE to be completed.				. ,					
	Chevron Asphalt	1281	8.0 W	5601 NW Front	Mark Pugh	PH Letter Agr for XPA (1/03)	хРА	03/03/06	Stormenter	Ongoing	XPA fleidwork complete, DEQ provided comments for source control screening; revised report due spring 2008	epring 2007	Wetting on SCE to be completed	p Med		Walting on SCE to be completed.									
	Chevron Asptest	1281	8 0 W	5501 NW From	Mark Pugh	PH Letter Agr for XPA (1/03)	ХРА	03/03/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	, N/A
	Chevron Asphalt	1281	8.0 W	5501 NW From	Mark Pugh	PH Letter Agr for XPA (1/03)	ХРА	03/03/06	Other	NÁ	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	NA	N/A
. [	ont Ave LP	1239	8.1 W	4950, 5034 & 5200 NW Front	Mile Rumero	VCP Letter Agr for PA (1/02)	RI .	03/09/08	Overland Transport/Sheet Flow	Ongoing	Conducting XPA	2008	Waiting on SCE to be completed	to be determined	to be determined	Waiting on SCE to be completed.									
F	oni Ave LP	1239	8.1 W	4950, 5034 & 5200 NW Front	Mike Romero	VCP Letter Agr for PA (1/02)	RI	03/09/06	Bank Erosion	Ongoing	Conducting XPA	2006	Waiting on SCE to be completed	io be determined		Welting on SCE to be completed									
F	ont Ave LP	1239	8.1 W	4950, 5034 & 5200 NW Front	Mike Romero	VCP Letter Agr for PA (1/02)	RI	03/09/06	Groundwater	Ongoing	Conducting XPA	2008	Walting on SCE to be completed	to be determined	i	Watting on SCE to be completed									
f	ont Ave LP	1239	8 1 W	4950, 5034 & 5200 NW Front	Mike Romero	VCP Letter Agr for PA (1/02)	Rì	03/09/06	Stormwater	Ongoing	Conducting XPA, additional assropling needed	2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed.									
F	ont Ave LP	1239	8.1 W	4950, 5034 & 5200 NW Front	Mike Romero	VCP Letter Agr for PA (1/02)	RI	03/09/08	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	· N/A	N/A
_[	Olacier	1239		4950, 5034 & 5200 MW From	_	VCP Letter Age for PA (1/02) Part of Front Ave	RI	03/09/06	Other	N/A	N/A	· N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A
.	Vorthweet inc.	2378		5034 NW Front Ave	Romero	LP ata, see ESCI #1239			Transport/Sheet																
L	Glacier Northwest Inc.	2378		5034 NW Front Ave	Mike Romero			<u> </u>	Bank Erosion																
<i>-</i> [	Glacter Northwest Inc. Glacter	2378		5034 NW Frant Ave	Mile Romero				Groundwater																
L	Northwest Inc.	2378		5034 NW From	Milus Romero				Stormweter	١,														·	
L	Glacier Northwest Inc. Glacier	2378	Ц	5034 NW Front Ave	Mike Romero				Overwater Activities																
_[	Glader Northwest Inc.	2378	L	5034 NW Front Ave	Mike Romero				Other						-										
2	usca	1338	82 E	6767 N Besin Ave.	Torn Geiner	VCP Letter Agr (2/04)	Ri	03/06/06	Overland Trensport/Sheet Flow	Completed			ineignificant pathway; no actions recommended	Low	to be determined	Weiting on SCE to be completed. Winter 2006									
	USCO	1338	82E	6767 N Gamin Ave	Tom Geiner	VCP Letter Agr (2/04)	Ri	03/08/06	Bark Erosion	Completed			ineignificant pathway; no actions recommended	Low		Waiting on SCE to be completed. Winter 2006									
	usco	1338	8.2 E	6787 N Basin Ave.	Torn Gainer	VCP Letter Agr (2/04)	Ri	03/06/06	Groundwater	Completed			insignificant pethway; no actions recommended	Low		Waiting on SCE to be completed. Winter 2006						_			
, [	USCG	1338	82 E	6767 N Besin Ave.	Tom Gelmer	VCP Letter Agr (2/04)	Rt	03/06/06	Stormwater	Ongoing	Sampling stormwater system	2006	Weiting on SCE to be completed	to be determined		Walting on SCE to be completed. Winter 2006									18 at 3

INTERNATION - Shading indicates that upland source control work has been completed.

i						ce control work										·									
	Cont		_	mation	urces	of contamina	tion to the	river	j		Source C	OUILOI EA	aluation (S	CE)		D1	•	e Control	Decisions	(SCDs) and	d Status.of	Source Con	tro! Me	asures (	SCMs)
		_	_			rype er	Project	Date teat	POLENIE	Status of	Misjar SCE tasks to be	Schedule for	Basis for determin	etion that are	era rautud la	STARLE OF EPA	t status Source control		STREAM OF EPA	SCH ESTABLE	MINIST STYCKING OF	Proposed SCH	UNIO BUIN	SUM OF EPA	Орапцон али
. ;	Site name	ECS: 6	Rive	Address	DEC PM	directing source	etetas	modified (m-d-v)	contaminant micretion	SCE.	completed	completing BCE		needed		review of SCE decision	effernetives evaluation and schedule (m-v)	Selected SChin	review of SCM selection decision	completed to date (m-v)	contaminants controlled	activities to be done and achedule (m-v)	completed (m-v)	review of correlated SCM	maintenance requirements
		l				İ							Pathway determination	Pathway priority leve	Site priority level		l			l.					
	usco	1338	82€	6767 N Best Aye.	Tom Geher	VCP Letter Agr (2/04)	RI	03/06/08	Overwater Activities	Ongoing	Evaluate dock activities	2008	Walting on SCE to be completed	to be determined		Waiting on SCE to be completed. Winter 2006									
$\mathbf{A}$	usco	1338	0.2 E	8767 N Beek	. Your	VCP Letter Agr (2/04)	RI	03/36/06	Other	N/A	N/A	N/A	N/A	none	1	N/A	N/A	, N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
7	Fred Devine	2365	8.3 E	8211 N Enelg	n Mark Pug	h No Agr	XPA	03/03/08	Overland Transport/Sheet Flow	Completed			ineignificent pethwity; no ections recommended	Low	p Med	Waiting on SCE completion									
1	Fred Devine	2365	8.3 E	6211 N Eneig	Mark Pug	in No Agr	ХРА	23/23/08	Barrik Eroelbri	N/A	N/A	N/A	N/A .	nane	1	N/A	N/A	N/A	N/A	N/A	N/A	N/A .	N/A	N/A	N/A
	Fred Devine	2365	83 E	6211 N Enelg	Mark Pug	h No Agr	ХРА	03/03/06	Groundwater	N/A	N/A	N/A	N/A	none		N/A	N/A	H/A	N/A	H/A	N/A	N/A	NA	N/A	NA
	Fred Devine	2365	5.3 E	6211 N Ensig	n Mark Pug	h No Agr	XPA	03/03/08	Stormeratur	Ongoing	nagotists agreement or issue order to conduct stormenter SCE	negotiate agreement or issue order by 8/2006, complete SCE early 2007	Walting on SCE to be completed	p Med		Waiting on SCE to be completed									
	Fred Devine	2365	83 E	6211 N Enelg	Mark Pug	h No Agr	хра	03/03/08	Overweter Activities	N/A	N/A	NA	No known current sources (spills reported to OERS)	none		N/A	N/A	N/A	NIA	N/A ·	NIA	N/A	N/A	N/A	N/A
لا	Fred Devine	2365	8.3 E	6211 N Enelg	Mark Pug	No Agr	ХРА	03/03/06	Other	N/A	N/A	N/A	N/A	, none		NIA	N/A	N/A	N/A	N/A	NIA	N/A	NIA	N/A	NA
2	Surface Surfac	220	255	THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAMED IN COLUMN TWO IS NAM		PH ( atter Agr lo	(E)3	(CP3)	( Contain 16 Principal Contain Post ( Contain )	WE TU			raigrati era pertudy Mili no action i di Traccommendad (1			EPA reviewed sool convenient M 8/2002 E		AND THE PERSON							
	Special Special Special	4	织	4000 KW/Feb			<b>中</b>		Princera	27.					linii:	EPA reversed and commented APP 6/2002 MII		11 E DE (12)							
	100 de 10		2512	4050 NW Flor		門也是是	MAG		e	e			irmerale ant postway, Maj (no actions 14 an a reconnectation of		198	EPA reversion and convenient									
	50 TABLE	850	H.			2) (2-24/20) (2/4)(20)	æλ	CONTRACT OF THE PERSON OF THE	A PACONE				Perpulikani patricay Possitti Metelciji 			EPA revenue and discounting practice (II)		NAMES OF THE PERSON NAMES							
		822	DX.	4559 W/F	Case Lack of	PHI CON AGE OF	綵	enter 1	2														麵	120	
7	Schritzer (Castops	<b>3</b> 29	œx	1985 N.Y. From		PHILOW AND IN XPA (900)			, em	ď										疆				E9 .	
-2	Freightliner Truck Plent	2366	1	6936 N Fathor	T	PH Agr for RVSCM (12/02)	۱	03/09/06	Overtand Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	, N/A	N/A	N/A	NIA	AIM	N/A	N/A	N/A	N/A	, N/A
	Freightliner Truck Plant	2386	8 4 E	5936 N Fether	Mike Romero	PH Agr los RI/SCM (12/02)	Ri	03/09/08	Benk Eroston	N/A	N/A	N/A	N/A	none		N/A	N/A -	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Freightliner Truck Plant	2368	8.4 E	6936 N Fethor	Malus Romero	PH Agr for RVSCM (12/02)	Ri	03/09/06	Oroundwater	Ongoing	determine nature and extent of VOC plums	SOW under development, 2006.	Waiting on SCE to be completed	to be determined	]	Weiting on SCE to be completed.									
	Freightliner Truck Plant	2366	84 E	6936 N Fathor	Mike Romero	PH Agr for RVSCM (12/02)	RI	03/09/08	Stomweter	Ongoing	SW evaluation needed	SOW under development, due spring 2006	Walting on SCE to be completed	to be determined		Walting on SCE to be completed.		RP voluntarily applying SW engineering controls on Eneign Street Outlast; coating metal roof							
	Freightliner Truck Plant	2386	8.4 E	6936 N Fathor	Romero	PH Agr for RI/SCM (12/02)	RI	03/09/06	Overwater Activities	N/A	N/A	N/A	N/A	none	1	NIA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<u>V</u>	Freightliner Truck Plant	2385	8.4 E	6930 N Fathor	n Romero	PH Agr for RISCM (12/02)	ŘI	03/09/06	Other	N/A	N/A	N/A	N/A	none	<u> </u>	N/A	N/A	N/A	N/A	N/A	N/A′	N/A	N/A	N/A	N/A
-9	Lakasida Industrias	2372	84W	4850 NW Fron	Big Robertson	PH Letter Age for XPA (3/02)	XPA	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A	N/A	N/A

Shading indicates that upland source control work has been completed.

		<b>1</b> - 20	acomy r	UCATE	a man upuan	NO SOUTO	e control work h	as been o	ompreted.									•								
	Con					ces	of contaminat	ion to the	river			Source C	ontrol Eva	aluation (S	CE)			Sourc	e Control	Decisions	(SCDs) and	d Status of	Source Con	trol Me	asures (	SCMs)
	<u> </u>	SI		ormati	on		***		1 124 141								Ргојес виви огера	t status		T RUMUM BY FPA	THE RESIDENCE	THE REPORT OF	T PROVING SCH	TUNA WW	T KURULAY PYA T	ON PART AND
	Site name	ECSI	Rive		ddrees i	PEQ PM	agreement directing source	Project status	medified (m-d-v)	pontaminant mieration	Status of SCE	Major SCE tanks to be completed	Schadule for completing SCE	Basis for desermin	nation that sou needed	oe centrol is	review of SCE decision	stematives evaluation and schedule (m-r)	Selected SCMs	review of SCM selection decision	completed to date	conteminants conteminants	activities to be done and achievine (m-v)	combiered		maintenance maintenance
		<u> </u>		1	Í.				<u> </u>	Ĺ '	_	_		Pathway determination	Pathway priority level	Eto priority level							1	j		
1	Lakeside Industries	2372	8.4 ¥	V 4850	NW Front P	BII obertson	PH Letter Agr for XPA (3/02)	XPA	03/06/06	Bank Erosion	Completed			Ineignificant pathway: no actions recommended	Low		Weiting on SCE completion									
	Laksoide Inclustries	2372	8.4 ¥	4850	NW Front R	(BIII obertson	PH Letter Agr for XPA (3/02)	ХРА	03/06/06	Groundwater	Ongoing	DEO review of SCE data and source control determination	2006	Waiting on SCE to be completed	to be determined		Waiting on SCE completion May 2006		UIC alcourse in 2003							
}	Lekeside Industries	2372	8.4 W	V 4850 I	NW Front R	88 obertson	PH Letter Agr for XPA (3/02)	ΧРА	03/06/08	Stormwater	Ongoing	initiate stormwater evaluation	to be determined	Walting on SCE to be completed	to be determined		Waiting on SCE completion		Interim SCM: stormwater UICs closure in 2003							
	Lakaside Industries	2372	844	4850 1	NW From R	Ball obertson	PH Letter Agr for XPA (3/02)	ХРА	03/06/06	Overwater Activities	NIA	N/A	N/A	No known current sources (splits reported to OERS)	none		N/A	N/A	N/A	NIA	N/A	NIA	N/A	N/A	N/A	N/A
V	Lakasida Industries	2372	8.4 W	4850 /	NW Front p.	Ball obertson	PH Letter Agr for XPA (3/02)	ХРА	03/06/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	· NA	N/A	NIA	N/A	N/A	. NVA
1	Portland Shipyard	271	8.4 E	5 Owner	n telend	ennifer Sutter	Pre-PH VCP Letter Agr (9498) PH Agr under negotation	RU	03/02/06	Bank Erosion	Ongoing	RP is conducting RI to determine if SCA is needed	SOW under development, due (90 days after PH Agr issued)	Waiting on SCE to be completed	p Med	p <b>Me</b> d	Walting on SCE to be completed.		•							
	Portland Shipyard	271	8.4 E	- Bwar		enniter Sutter	Pre-PH VCP Letter Agr (9/96)	RI	03/02/08	Bank Erosion - 14 Chantal Ava Fab Avan	Ongoing	RP is conducting RI to determine if SCA is needed	SOW under development, due (under review).	Waiting on SCE to be completed	p Med		Waiting on SCE to be completed Spring 2006									
	Portions Shipyard	271	8.4 E	Swar	n Island	eresiter Suction	Pre-PH VCP Letter Age (9496)	Ri	03/02/08	Groundweter	Ongoing	RP is conducting RI to determine if SCA is needed	SOW under development, due (90 days after PH Agr baued)	Walting on SCE to be completed	p Med	- I	Waiting on SCE to be completed.	·								
	Portand Shipyard	271	0.4 E	Ser		ermilier Sutter	Pre-PH VCP Latter Agr (B/98)	RI	03/02/06	Groundwater - til Churr (4 Ave Cab Avru	Ongoing	RP is conducting RI to determine # SCA is needed	SOW under development, due (under review).	Waiting on SCE to be completed	p Med		Waiting on SCE to be completed. Spring 2008									
	Portland Shipyard	271	84 E	Swer	n island	erenter Butter	Pre-PH VCP Lutter Agr (9/98)	RI	03/02/06	Stomester	Not Started	Negotieting agreement with cuttent Owner	negotists agraement by 8/2006, initiate SW evaluation summer 2006	Waiting on SCE to be completed.	p Mand	•	Westing on SCE to be completed.									
	Portand Shipyard	271	8.4 E	9		erenifer Suitter	Pre-PH VCP Letter Agr (9/98)	RI	03/02/06	Stormweter - N Channel Asia Figh Anua	Ongoing	RP is conducting RI to determine if SCA is needed	Supplemental RI data needed; to be completed by Spring 2008	Walting on SCE to be completed	p <b>Med</b>		Walting on SCE to be completed. Spring 2006									
	Portland Shipyard	271	84E	Sween		ennifer Summer	Pre-PH VCP Letter Agr (9/98)	RJ	03/02/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spills will be reported to DERS)	none		N/A	N/A	'· N/A	N/A	N/A	NIA	AVA	N/A	N/A	N/A
. [	Portand Shipyard	271	8.4 E	Swan	n letend	ennifer 9uter	Pre-PH VCP Lutter Agr (9/98)	RI	03/02/08	Overseter Activities - N Channel Ave Enh Arts	N/A	N/A	N/A	No known current sources (aptile will be reported to OERS)	none		N/A	N/A	N/A	NIA	N/A *	N/A	N/A	N/A	N/A	NIA
	Portland Shipyard	271	84 E	9wan		ernsfer Sutter	Pre-Pt-I VCP Letter Agr (9/96)	Ru	03/02/06	Overland Transport/Shart Flow	Ongoing	RP is conducting RI to datarmine if SCA is needed	SOW under development, due (90 days after PH Agr leased)	Weiting on SCE to be completed	p Low	1	Wetting on SCE to be completed. Spring 2006									
	Portand Shippard	271	8.4 E	1	n Maria		Pre-PH VCP Letter Agr (9/98)	RI	03/02/06	Overland Transport/Sheet Flow - P Channel Act Pale A(E)	Ongoing	RP is conducting RI to determine If SCA is needed	SOW under development, due (under review).	Waiting on SCE to be completed	p Maded		Waiting on SCE to be completed. Spring 2006					,				
2							XPA (MILITARY	擱	0,000)	Tage of the last							EFA 471000									
1		靈					MANAGE AND AND AND AND AND AND AND AND AND AND							TO COMPANY			PASOS MAN									
	e. €			調		HIIII.	HILLING CHANNE PH Letter Agrica XPA (300)				Carpina			Application parties at the contract of the con			EPA revenued		CONTRACTOR							
$\rfloor$					Digital States		PH LESSY AGY IS PH LESSY AGY IS MKPA (SR) IS		03/03/08 103/03/08		Completed			relations persons (accommended			EPA reviewed and commented [1] 6/20027[1]	THE LE								

Source Control Evaluation (SCE) Source Control Decisions (SCDs) and Status of Source Control Measures (SCMs) Confirmed or suspected SOUICES of contamination to the river Project status 6/2002 9.03B C ΧPA 03/06/06 N/A NA IL NEA THE MA . NA H THE WAR THE ST N/A IN NEA !! N. NA I CLOWOO NA ! AVA .... riote. N/A , jiva , I NA I INA II HA I XPA , which has been a maked all NIA') NEA 15 h N/A 0310810 1 NA "III NA XPA NA 1 Na. PH Agr for RVSCM (8/00 N/A none o Low N/A N/A NIA N/A N/A N/A PH Agr for RVSCM (8/00) 03/06/06 Bank Ercelor N/A N/A NA none N/A N/A NA ΝA N/A N/A N/A Draft SCE expected earl 2006 4500 Block Front Ave. PH Agr for RI/SCM (6/00) ting on SCE to be Waiting for SCE to be completed 03/06/08 o Low N/A N/A 4500 Block Front Ave. PH Agr for RVSCM (8/00) N/A PH Agr for RUSCM (8400) N/A N/A Pie-Pit VCP conditional courses in Ref 2004 laiting on SCE to be completed to be Waiting on SCE to be completed 03/07/06 4400 Block Street 8.5 Bank Eroston PPA 03/07/06 none N/A N/A N/A N/A N/A 03/07/06 N/A N/A N/A N/A ulting on SCE to be completed Waiting on SCE to be completed PGE Fores to be 4400 Block Street PPA RI 03/07/06 Ongoing o be determi 4400 Block Street N/A nome N/A NA N/A N/A N/A N/A N/A N/A N/A N/A NA none N/A N/A NA N/A N/A N/A 03/07/06 Other N/A

						e control work h											,								
	Cont		_		rces	of contaminat	ion to the	river	ł		Source C	ontrol Eva	aluation (S	E)			•	e Control	Decisions	(SCDs) and	d Status of	Source Con	trol Me	asures (S	(CMs)
	<del></del>			mation	I	Тура Бт	Project	CORES MARI	Perentur	Matus of	Major SCE tasks to be	Schedule for	Basia for determin	dian that area	na control la	SEELS OF EPA	status Source convoi		SIERUS DE EPA	SCH BCHVINGS	MARK SA ASUMMA SA	Proposed SCIII	DM9 SCM	BUILDI DI EPA	Оранация вла
	Site name	ECSIS	River	Address	DEQ PM	agreement directing source	Project status	modified (m-d-v)	oontaminant micration	SCE	completed	completing SCE	<u> </u>	needed		review of BCE decision	alternatives evaluation and schedule (m-v)	Selected SCAS	review of SCM selection decision	completed to date (m-v1	eontaminants believinos	activities to be done and achedule (m-v)	completed (m-v)	completed SCM	meintenance reculrements
<del></del>		_	╄	<u> </u>					Overland				Pathway determination	Pathway priority level	Site priority level								<u> </u>		
12	Christensen	2428	8.9 W	3821 NW St Hallens	Tom Gainer	VCP Letter Agr for PA (8/00)	XPA	03/06/06	Transport/Sheet Flow	N/A	NIA	N/A	N/A	none	to be determined	NIA	N/A	N/A	N/A	NIA	N/A	N/A	NIA	NIA	N/A
1	Christensen Oil	2428	89₩	3821 NW St Holens	Tom Gainer	VCP Letter Agr for PA (8/00)	XPA	03/06/06	Dank Erceion	N/A	N/A	N/A	N/A	rone		NIA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A ·
1	Christanson	2426	8 8 W	3821 NW St Hulana	Tom Gainer	VCP Letter Agr for PA (8/00)	XPA	03/06/06	Groundweter	NA	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	₩A
	Christeneen Oil	2428	8 9 W	3821 NW St Helens	Tom Gelmer	VCP Letter Agr for PA (8/00)	хРА	03/06/06	Stortywester	Ongoing	Panding review of SW data, XPA mostly complete	2008	Waiting on SCE to be completed	to be determined		Warting on SCE to be completed; 2008		Storm water BMPs and fittering catch basin sediment							
Л	Christensen Oil	2428	8 9 W	-	Tom Geiner	VCP Letter Agr for PA (8/00)	ХРА	03/06/06	Overwater Activities	N/A	N/A	N/A	N/A	none	1	N/A	N/A	N/A	N/A	N/A	NUA	N/A	N/A	N/A	N/A
<u>V</u>	Christensen Oil	2428	88W	3821 NW St Helena	Tom Geiner	VCP Later Agr for PA (8/00)	XPA	03/06/06	Other	N/A	N/A	N/A	N/A	none	<u> </u>	N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A
12	Texaco Tembrai	169		3800 NW St Holens	Matt McClincy	PH Agr for RI/SCM (8/00)	RI	03/0606	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	so be signermined	N/A	N/A	N/A	. N/A	NIA	N/A	N/A	N/A	N/A .	N/A
	Texaco Terminal	189	8.8 W	3800 NW St Helens	Meti McClincy	PH Agr for RI/SCM (8/00)	RI	03/0806	Bank Eroelon	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1	Texaco Terminal	169	8.9 W	3500 NW 51 Holene	Matt McCBncy	PH Agr for RI/SCM (8/00)	RI	03/0606	Groundwister	Ongoing	RP needs to finalize RI and SCE report	Orafi SCE expected early 2006	Walting on SCE to be completed	p Low	1	Weiting for SCE to be completed							,		
1	Taxaco Terminal	169	8.9 W	3800 NW St Historia	Matt McClincy	PH Agr for RI/SCM (8/00)	RI	03/0606	Stormenter	Ongoing	RP needs to finalize RI and 8CE report	Draft SCE expected early 2006	Walting on SCE to be completed	to be determined		Walting on SCE to be completed				· · · · · ·					
	Texaco Terminal	169	8.9 W	3800 NW St Hadens	Matt McCincy	PH Agr for RI/SCM (8/00)	RI	03/0508	Overstater Activities	₩A <sub>,</sub>	N/A	N/A	No known current sources (spills reported to OERS)	rone		N/A	N/A	N/A	N.IA	N/A	NIA	N/A	N/A	NVA	N/A
<u>V</u>	Texaco Terminal	189	8.9 W	Helens	Met McClincy	PH Agr for RVSCM (8/00)	RI	03/0606	Other	N/A	N/A	NIA	N/A	none	1	N/A	N/A	N/A	N/A	N/A	NUA	N/A	N/A	N/A	N/A
73	Anderson Brothers Property	970	0.9	5279 & 5315 NW St. Helens Rd.	Bob Schwarz	ICP	RI	03/06/06	Overland Transport/Sheet Flow	N/A	NJA	N/A	N/A	none	to be desermined	N/A	N/A	N/A	NIA	N/A	NIA	N/A	NA	N/A	N/A
1	Anderson Brothers Property	970	8,9	5275 & 5315 NW St. Helens Rd.	Bob Schwarz	ICP	Ri	03/06/06	Bunk Erosion	N/A	N/A	NVA	N/A	none		N/A	N/A	N/A	N/A	N/A	NIA	N/A	NA	N/A	, N/A
1	Anderson Brothers Property	970	8.9	5275 & 5315 NW St. Helena Rd	Bob Schwarz	ICP	RI	03/06/06	Groundweter	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1	Anderson Brothers Property	970	8,9	5275 & 5315 NW St Helens Rd.	Bob Schwerz	ICP	RI	03/05/06	Stormwater	Ongoing	Catch beein sampling and analysis in progress	No current echedule	Welting on SCE to be completed	to be determined		Wainting on SCE to be completed				,					*
	Anderson Brothers Property	870	89	6275 & 5315 NW St. Helune Rd.	Bob Schwarz	- ICP	RI	03/06/06	Overweter Activities	N/A	N/A	N/A	· N/A	none	]	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
$\overline{\Lambda}$	Anderson Brothers Property	970	8,9	\$276 & 5315 NW St. Helens Rd.	Bob Schwarz	ICP	RI	03/06/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
:	Vanwatar and Rogers	130		3950 NW Yeor Ave	EPA lead, Kristine Koch				Overland Transport/Sheet Flow																
)	Varentee and Rogers	330	•	3950 NW Yeor Ave	EPA lead; Krtetine Koch		}		Sank Erosion						]										
,	Vanwater end Rogers	330	•	3950 NW Yeon Ave	EPA lead, Kristine Koch				Groundweter																
	Varwater and Rogers	330	•	3950 NW Year Ave	EPA lead: Kristine Koch				Storrowater						]										
	Verweter and Rogers	330	9	3950 NW Year Ave	EPA lead; Kristine Koch				Overwater Activities																
	Varietter en Rogere	330	D	3950 NW Yeor Ave	EPA lead; Kristine Koch				Other															•	
13	Guilde Lake RR Yard	100	904	3500 MW Year	Mile Romero	PH Agrifor RVSCM (12/02)	Ri	03/09/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	NA	N/A
1	Guilds Lake RR Yard	100	9.0 W	3500 NW Year	Mike	PH Agr for RI/SCM (12/02)	Ri	03/09/06	Bank Eroelon	N/A	H/A	N/A	N/A	none	1	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Shading Indicates that upland source control work has been completed.

-	Conf	-	_		urces	of contaminat	ion to the	river			Source Co	ontrol Eve	luation (S	CE)			Sourc	e Control	Decisions	(SCDs) and	Status of	Source Con	rol Me	asures (	SCMs)
-		Slta	Infor	mation				THE U.S.	POLENCE							Projec	t status		1 BURGLOVEVA	ECH IZHOURA					
	Site name	ECBI #	River	Address	DEQ PM	agreement directing source	Project status	modified (m-d-v)	contaminant microtion	Status of SCE	Major BCE tasks to be completed	Schedule for completing SCE	Pathway	Pathway	Bits priority	review of BCE decision	stemative evaluation and schedule (m-v)	Selected SCHs	review of SCM selection decision	completed to date	contaminants controlled	activities to be done and achedule (m-v)	completed (m-v)	status or EPA review of cornolisted SCM	Operation and maintenance requirements
4	Gulide Lake RR Yard	100 -	9.0 W	3500 NW Yeon	Mike Romero	PH Agr for RYSCM (12/02)	RI	03/09/06	Groundwater	Ongoing	GW Investigation ongoing: in early stages	2008 Pre-RI report Identified earne sources, full SCE echedule to be determined	determination  Waiting on SCE to be completed	to be determined	level	Waiting on SCE to be completed									
	Guilde Leke RR Yard	100	80₩	3500 NW Yeon	Mālus Romeno	PH Agr for RV8CM (12/02)	RI	03/09/05	Stormwater	Ongoing	SW investigation ongoing: In early stages	2008 Pre-RJ report identified some sources: NJI SCE schedule to be determined	Waiting on SCE to be completed	to be determined		Wetting on SCE to be completed									
	Guilds Lake RR Yard	100	eow	3600 NW Yeon	Mike Romero	PH Agr for RVSCM (12/02)	ŘI	03/09/08	Overwater Activities	N/A	, N/A	N/A	N/A	none		N/A	N/A	N/A ,	N/A	N/A	N/A	N/A ,	N/A	N/A	N/A .
$V_{\rightarrow}$	Guilda Lake RR Yard	100	90W	3500 NW Year	Mile Romero	PH Agr for RYSCM (12/02)	Rd	03/09/06	Other	N/A	N/A	N/A	N/A	none	L	N/A	N/A	N/A	NIA	N/A	N/A	N/A ;	N/A	N/A	N/A
7	Gunderson	1155	9.0 W	4350 SW Front	Dense Bayuk	Pre-PH VCP Formal Agr for RUF9 (1994)	RI	03/08/06	Overland Transport/Sheet Flow - Arus 1	N/A	N/A, antirely paved ancilor developed	N/A	N/A	none	p H <b>igh</b>	N/A	N/A	N/A	NA	N/A	N/A	N/A	N/A	N/A	N/A
\	Gunderson	1155	w 0.0	4350 SW Front	Dane Bayuk	Pre-PH VCP Formal Agr for RUFS (1994)	133	03/08/06	Overland Transport/Sheet Flow - Area 2	Ongoing	Complete RI report with source control acreening, prepare source control decision	Summer 2008	Pethwey is complete	pHigh		Waiting on SCE to be completed.			_			i			
	Gunderson	1156	9.0 W	4350 SW Front	Dens Bayus	Pre-PH VCP Formal Agr for RUFS (1984)	RI	03/08/06	Overland Transport/Sheet Flow - Ame 2	Ongoing	Complete RI report with source control ecreening, prepare source control decision	Summer 2005	Pethwey is complete	p High		Weiting on SCE completion									
	Gunderson	1156	9.0 W	4350 SW Frant	Dane Bayuk	Pre-PH VCP Formal Agr for RI/FS (1994)	Æ	03/08/06	Benk Eroskin - Ariai I	Ongoing	Survey of erodible soils, follow-up sampling	No current achticule.	Walting on SCE to be completed	to be determined		Welting on SCE completion									
	Gunderson	1155	9.0 W	4360 SW Front	Dana Beyuk	Pre-PH VCP Formal Agr for RUFS (1994)	Ru	03/06/06	Bank Erosion - Aran 2	Ongoing	Complete RI report with acuzoe control screening, prepare acuros control decision	Summer 2006	Pathway is complete	p High		Walting on SCE completion		,							
	Gunderson	1 155	9.0 W	4350 5W Front	Dens Beyuk	Pre-PH VCP Formal Agr for RI/FS (1994)	. RI	03/06/06	Bank Erosion -	Ongoing	Complete RI report with source control screening, prepare source control decision	Summer 2006	Patheray is complete	p High		Walting on SCE completion								Ì	
	Gunderson	1155	90W	4350 SW Front	Cene Bayus	Pre-PH VCP Formal Agr for RUFS (1994)	RI	03/08/06	Overwater Activities - Arts 3	N/A	N/A	N/A	No known current sources (apills reported to OERS)	none	}	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A	N/A	N/A
	Gunderson	1155	W 0.8	4350 SW Front	Cana Bayuk	Pre-PH VCP Formal Agrifor RUFS (1994)	Rı	03/08/08	Groundwater - Su-e I	Completed	N/A, SCE submitted to EPA February 2003, SCA4s implemented	NA	Oroundwater is a complete pathway. VOC plume migrating to river.	p Med		EPA comments received 5/03	alternatives evaluation completed, EPA communa received 5/2003	Hydraulic containment and source femoral	SCD automitted to EPA 2/2003, EPA comments received 5/2003	P&T and AS/SVE systems installed and operating	~20 lbs. of HVOCs removed as of 11/05	Assets downgradient capture of VOC plume on Labelde Industries property. Schedule TBD			Quarterly performance monitoring and reporting
	Gunderson	1155	9.0 W	4360 SW Front	Dane Bayuk	Pre-PH VCP Formal Agr for RUFS (1994)	RJ	03/06/06	Groundester - Amn 2	Ongoing	Complete RI report with acuroe control screening, prepare source control decision	Summer 2006	Walting on SCE to be completed	to be determined		Waiting on SCE to be complished						4			
	Gunderson	1155	90W	4350 SW From	Oere Beyuk	Pre-PH VCP Formal Age for RVFS (1994)	RJ.	03/08/08	Groundwater - Area 3	Origoing	Complete RI report with source cantrol screening, prepare source control decision	Summer 2008	Walting on SCE to be completed	to be determined		Waiting on SCE to be completed									
	Gunderson	1155	80W	4350 5W Front	Dane Beyuk	Pre-PH VCP Formal Agr for RUFS (1994)	Rt	03/08/06	Stormwater - Artist I	Ongoing	Compile, review and screen data	No outrent schedule.	Walting on SCE to be completed	to be determined		Waiting on SCE to be completed							\_		
	Ounderson	1155	90₩	4350 SW Front	Dens Bayus	Pre-PH VCP Formal Agr for RVF8 (1994)	RI	00/06/06	Stormenter -	Ontoing	Complete RI report with source control screening, prepare source control decision	Summer 2006	Waiting on SCE to be completed	p High		Walting on SCE to be completed.									
$\setminus \mid$	Gunderson	1155	90W	4360 SW From	Dene BeylA	Pre-PH VCP Formal Agr for RVFS (1994)	R	03/08/06	Stormweter - /yea 5	Origina	Complete RI report with source control screening, prepare source control decision	Stammer 2006	Waiting on BCE to be completed	p High		Waiting on SCE to be completed.									
V	Gunderson	1155	80W	4360 SW Front	Dans Bayuk	Pre-PH VCP Formal Agr for RMFS (1994)	RJ.	03/06/06	Other	NVA	N/A	NIA	N/A	none		N/A	NA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
3	Freightliner (Parts Mig Plant)	115	92 E	5400 N Basin	Mike Romero	PH Agr for RVSCM (12/02)	RI	03/09/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	NIA	N/A	N/A	H/A	N/A	N/A	N/A	. N/A

= Shading indicates that upland source control work has been completed.

[	Confl			nation	ırces	of conteminat	on to the	river			Source Co	ontrol Eva	luation (S	CE)		•	•	e Control	Decisions	(SCDs) and	Status of	Source Con	trol Me	asures (	SCMs)
Ì	Site come	ECSI #	River	Address	DEQ PM	1ype or agreement directing source	Project . status	medified (m-d-v)	Potential contaminant migration	Status of SCE	Major BCE tasks to be completed	Schedule for completing SCE	Basis for determin	ation that cour needed	rce control la	Project status or EPA review of SCE decision	SOURS SONYOL alternatives evaluation and achedule (m-v)	Belected SCIds	STATUS OF EPA review of SCM selection decision	SCSI SCHVINGS completed to date (m-r)	MILES OF VOIUME OF contaminants controlled	Proposed SUM activities to be done and schedule (m-v)	DES SUR completed (m-r)	BLILLE OF EPA review of completed SCM	Operation and meintenance requirements
													Pathway determination	Pethway priority level	Site priority level										
11	Freightliner (Perts Mfg Plant)	115	92 E	5400 N Basin	-Milus Romano	PH Agr for RVSCM (12/02)	RJ	03/09/06	Bank Eroeion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	NAV.	N/A	N/A	N/A	N/A	N/A	N/A
	Freightliner (Parts Mig Plant)	115	02 E	5400 N Basin	Mike Romero	PH Agr for RI/SCM (12/02)	R)	,03/06/36	Groundweter	Ongoing	GW investigation neering completion	2008	Walting on SCE to be completed	to be determined						•					
	Freightliner (Parts Mfg Plant)	115	9.2 E	5400 N Basin	Mike Romero	PH Agr for RVSCM (12/02)	RI	03/09/06	Stormwater	Ongoing	Additional atomicster sampling needed	SOW under development, due spring 2008	Walting on SCE to be completed	to be determined			·								
$I \downarrow$	Freightliner (Perts Mitg Plant)	115	92 E	5400 N Beetn	Mike Romero	PH Agr for RI/SCM (12/02)	Ri	03/09/06	Overwater Activities	N/A	N/A	N/A	N/A	none	_	N/A	N/A	N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A
$\sqrt{ v }$	Freightliner (Parts Mfg Plant)	115	92€	5400 N Basin	Mike Romero	PH Agr for RVSCM (12/02)	Rì	03/09/06	Other	N/A	N/A	N/A	N/A	none .		N/A	NIA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
T3	Columbia American Plating	29	9.3	3003 NW 358: Ave	Mark Pugh	Negotieting PPA	Negotleting PPA	03/06/08	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A ·	N/A	N/A	NIA	NA	N/A	NIA	N/A
1	Columbia American Plating	29	9.3	3003 NW 35th Ave	Mark Pugh	Negotiating PPA	Negotiating PPA	03/06/06	Bank Erosion	N/A	N/A	N/A	N/A	none		NIA	N/A	N/A	N/A	N/A	N/A	'N/A	N/A	N/A	N/A
	Cotumbia American Plating	29	9.3	3003 NW 35th Ave	Mark Pugh	Negotisting PPA	Negotiating PPA	00/06/06	Groundweter	Not Started		No current schedule, pending PPA development	Walting on SCE to be completed	to be determined											
	Columbia American Pluting	29	9.3	3003 NW 356) Ave	Mark Pugh	Negotiating PPA	Negotiating PPA	03/06/08	Stormwater	Not Started	tretalistion and sampling of storm drain	No current schedule; pending PPA development	Waiting on SCE to be completed	to be determined											
	Columbia American Plating Columbia	29	93	3003 NW 35th	Mark Pugh	Negotistrag PPA	Negotiating PPA	03/06/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A
4	American Plating	29	9.3	3003 NW 35th Ave	Mark Pugh	Negotiating PPA	Negotiating PPA	03/06/06	Other	NIA	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	NA	N/A	N/A	N/A	N/A
73	GE Decommis- sioning	4003	95W	2727 NW 29th	Tom Gainer	PH Age for XPA (1/04)	ХРА	03/06/08	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	GE Decommis- sioning	4003	9.5 W	2727 NW 29th	Tom Gainer	PH Age for XPA (1/04)	хРА	03/06/08	Benk Ercelon	N/A	N/A	N/A	NIA	none		N/A	R/A	NA	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	GE Decommis- eloning	4003	9.5 W	2727 NW 29th	Tom Geiner	PH Agr for XPA (1/04)	ХРА	00/06/06	Groundwater	N/A	N/A	N/A	N/A	none		N/A	N/A	NIA	N/A	N/A	N/A	WA	N/A	N/A	NIA
	GE Decommis- stoning	4003	95W	2727 HW 29th	Tom Galner	PH Agr for XPA (1/04)	ХРА	coroerce	. Stormweter	Ongoing	RP is continuing Investigations to determine if SCM is needed	2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be complete; surrener 2008		initiated removal of PCB contaminated sediment from oneite catch basins and pipes							_
	GE Decommis- atoning	4003	9.5 W	2727 NW 29th	Tom Gainer	PH Agr for XPA (1/04)	ХРА	03/06/08	Dverwater Activities	NA	N/A	N/A	N/A	none		RIA	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A	H/A
13	Galvanizars Company	1196	9 6 W	2406 NW 30h	Ozna Bayuk	PH Agr for XPA (10/03)	ХРА	03/07/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
1	Galvanizara Company	1198	96W	2408 NW 30h	Dana Bayuk	PH Agr for XPA (10/03)	ХРА	03/07/08	Bank Erosion	N/A	N/A	N/A	N/A	none -		N/A	NA	N/A	N/A	N/A	N/A	N/A	N/A	N/A	· N/A
$\downarrow$	Getvenizere Company	1198	88W	2406 NW 30h	Dene Beyuk	PH Age for XPA (10/03)	ХРА	03/07/06	Groundwater	Ongoing	XPA complete, data being reviewed and analyzed	2008	Watting on SCE to be completed	to be determined		Weiting on SCE to be completed. (2006)								,	

ANIMATEL - Shading indicates that uptand source control work has been completed

	MUTTHE G 811																<del>,                                     </del>								
-	Conf				urces	of contaminat	don to the	river	l		Source Co	ontrol Eva	aluation (S	CE)				e Control	Decisions	(SCDs) an	d Status of	Source Con	trol Me	easures (	SCMs)
}		_	e Infor	mation	<del>,</del>	Тура от		Date that	PSCENCILLI	Status of	Major SCE tasks to be	Schedule for	Basis for determin	ation that con-	-	Project STEPA	SOURCE CONTROL		) STRICE OF EPA	J BUN BUTTHES	J BIESE SPVOKEMS OF	Proposed scal	) Date scar	) BILLUS SPEPA	Openson and
- [	\$ão neme	ECSI 6	mile	Address	DEQ PM	agreement directing source	Project status	modified (m-d-v)	contaminant migration	SCE SCE	completed	completing SCE	<b> </b>	needed		review of BCE decision	Shorpetives evaluation and schedule (m-v)	Belocted SCMs	review of SCM extention decision	completed to date (m-v)	contaminants controlled	activities to be done and schedule (m-v)	completed (m-v)	review of completed SCM	meintenance reculrements
ı													Pethway determination	Patheny priority level	Site priority level			1			l				
	Gelvanizere Company	1196	9.6 W	2406 NW 30h	Dena Beytik	PH Agr for XPA (10/03)	хра	03/07/06	Storrwitter	Ongoing	XPA complete, data being reviewed and analyzed	2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed. (2006)									
	Galvanizana Company	1196	9.6 W	2406 NW 30h	Dene Beyuli	PH Agr for XPA (10/03)	хРА	03/07/08	Overwater Activities	N/A	NIA	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	NIA	N/A .	N/A	N/A	N/A
] ر	Getvenizers Company	1 198	9 8 W	2406 NW 30h	Dara Beyuk	PH Agr for XPA (10/03)	хра	03/07/06	Other	N/A	N/A	N/A ,	N/A	none		N/A	. N/A	N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A
3	Abentage	<b>8</b> 250	oxe	2000 H PA		PH Letter Age for XPA (2000)	220	OSVOBOS BORRES	Transport/Sheet	Concluded (			reignist ant pastwoy			EPA reviewed and commented UNIO 504 T.L.I		AND SCM RESCRIPTION							
7		223	αx	mark Land		ALEMAN OF THE ACT OF T		03/08/08															暖	EZA.	
				الارتان				AMERICAL PROPERTY.			ALTERNATION STATEMENT		Tanagas (N.D.) (1997)	THE WHAT COM				NO OC AN COMMAND						April 1	
			cie	\$100 H\$		0 ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) ( ) (	岛							ALLESS FRANCE		SATISTICATION OF THE PARTY OF T		NO SCH RESONS						ß	
		222	ලාද	THE PERSON NAMED IN	40.00	PH Latey Apr los XPA (2000)	盛	Marce co.		22														CZA	0
		200	1	2650 N River (1746) 184	遇	PHL suit A ( ) Lega (2000)		<b>E</b>	Gard.						蠿				T L	THE T			i co	1220	gs.
3	Port of Portland Terminal 2	2769	1	3556 NW From		IGA	хра	03/06/08	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
	Port of Portland Terminal 2	2769	100 W	3536 NW From	Tom Gainer	КДА	ХРА	03/05/06	Bank Erosion	N/A	NIA	N/A	N/A	none		NIA	N/A	NA	N/A	N/A	NIA	N/A	NIA	N/A	N/A
ľ	Port of Portand Terminal 2	2789	10.0 W	3568 NW From	Tom Gelner	IGA .	ХРА	03/06/06	Groundwater	Completed			Insignificant pathway; no actions recommended	Low		Watting on SCE to be completed; 2006		_							
	Port of Portland Terminal 2	2769	100 W	3556 NW Front	Tom Gainer	KQA	хРА	03/06/06	Storrwater	Ongoing	Evaluate stormwater system	2006	Walting on SCE to be completed	to be determined	]	Waiting on SCE to be completed; 2006									
	Port of Portland Terminal 2	2769	10.0 W	3556 NW Front	Tom Gainer	IGA	ХРА	03/06/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A
,[	Port of Portland Terminal 2	2769	10.0 W	3566 NW From	Tom Galner	IGA	хра	03/06/06	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A
5	JPRR Albina	178	103E	2745 N Interstate	Mike Romero	PH Agr for RI/SCM (3/02)	RI	03/09/06	Overland Transport/Sheet Flow	Ongoing	SCE ongoing	2008	Waiting on SCE to be completed	to be determined	to be determined	Waiting on SCE to be completed									
ŀ	JPRR Albins	178	10.3 E	2745 N Interstate	Mike Romero	PH Agrifor RVSCM (3/02)	Ri	03/09/06	Bank Erosion	Ongoing	SCE ongoing	2008	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed									
ŀ	JPRR Albine	178	10.3 E	2745 N Interstate	Miles Romero	PH Agr for RVSCM (3/02)	RI	03/09/06	Groundweter	Ongoing	SCE ongoing	2006	Walting on SCE to be completed	to be determined		Walling on SCE to be completed									
ŀ	PRR Albinu	178	10.3 E	2745 N Interstate	Mille Romero	PH Agr for RI/SCM (3/02)	RI	03/09/06	Stormwater	Ongoing	SCE ongoing	2006	Walting on SCE to be completed	to be determined		Walting on SCE to be completed						· .			
/	PRR Abine	- 178	10.3 E	2745 N Interetate	Mike Romero	PH Agr for RVSCM (3/02)	RI	03/09/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Experience indicates that unless source control work has been concluded

i								<del>-</del>					<del> </del>							·					
	Confi				irces	of contaminat	ion to the	dver	J		Source C	ontrol Eva	duation (S	CE)				e Control	Decisions	(SCDs) and	d Status of	Source Con	trol Me	easures (S	SCMs)
				mation		Type or	Project	DAM DAT	PARKET	Status of	Major BCE tanks to be	Schedule for				Project	Source control		STELLES OF EPA	SCM SCOVERS	MASS OF VOIUMS OF	Proposed SCHI	DRIS SCM	STRILL SPEPA 1	OCHPITION BAST
	Site name	ECSI 9	mile	Address	DEG PM	égreement directine source	etable	modified (m-d-v)	eontaminent micration	SCE	completed	completing SCE	Basis for determin	needed	Site priority	review of SCE decision	atternatives evaluation and echedule (m-y)	Selected 9CMs	review of SCM selection decision	completed to date (m-v)	controlled	activities to be done and achedule (m-v)	compteted fm-v1	review of completed SCM	maintenance recuirements
.													determination	Pashway priority level	level				Ĺ						
1	UPRR ABline	178	10.3 E	2745 N Interetiple	N/As Romero	PH Agr for RVSCM (3/02)	Rì	00/06/06	Other	N/A	N/A	N/A	N/A	, none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
T3	PGE Substation E	3976	104	2835 NW Front Ave.	Tom Gelher	VCP	XPA	03/02/08	Oyerland Transport/Sheet Flow	N/A	N/A	N/A	N/A	None	Low	NEA	N/A	N/A	N/A	N/A	NIA	N/A	N/A	N/A	N/A
1	PGE Substition E	3976	10.4	2835 NW Front Ave.	Tom Geiner	VCP	хра	03/02/08	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
-1	PQE Bubitation E	3978	10.4	2836 NW Front Ave.	Tom Gainer	VCP	ХРА	03/02/06	Groundwater	Completed	<del>_</del>		Ineignificant perfeway; no actions recommended	Low	·	SCE submitted to EPA for review 3/2006									
	PGE Bubatation E	3976	104	2635 NW Front Ave.	Tom Gelmer	VCP	XРА	03/02/08	Stormenter	N/A	NIA	NIA	NA	none		N/A	NIA	N/A	N/A	N/A	NA	NVA	N/A	N/A	N/A
	PGE Substation E	3976	10 4	2635 NW Front Ave.	Tom Gelmer	VCP	ХРА	03/02/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	. N/A	N/A	N/A	N/A	N/A	N/A	N/A
Y	PGE Bubitation E	3976	104	2636 MW From Ave.	Tom Gelner	VCP	ХРА	03/02/08	Other	N/A	N/A	NIA	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
TZ	Sultair Pump	1235	10 4 W	2800 NW Front	Mark Pugh	PH Agr for XIPA (9/02)	ΧРА	03/03/06	Overland TransportSheet Flow	N/A	N/A	N/A	N/A	none	p Med	N/A	NA	N/A	N/A	NA	N/A	N/A	N/A	N/A	N/A
	Bulzer Pump	1235	10.4 W	2800 MW From	Mark Pugh	PH Agr tol XPA (9/02)	ХРА	03/03/08	Bank Eroston	Ongoing	RP is conducting a SCE	SCE to be completed in fall 2008	Watting on SCE to be completed	p LOw		Waiting on SCE to be complished, fall 2008			_				l 		
	Subser Pump	1235	10.4 W	2800 NW Front	Mark Push	PH Agr for XPA (9/02)	ХРА	03/03/06	Groundwitter	Ongoing	RP is conducting a SCE	SCE to be completed in fall 2006	Walting on SCE to be completed	p Low		Welting on SCE to be completed, fall 2006									
	Suizar Pump	1235	10 4 W	2800 NW From	Mark Pagi	PH Agr for XPA (9/02)	XPA	03/03/08	Stormwater	Ongoing	RP is conducting a SCE	SCE to be completed in tell 2006	Waiting on SCE to be completed	p Med		Waiting on SCE to be completed, full 2008									<u></u>
	Sutzer Pump	1236	104W	2800 MW From	Mark Pugi	PH Age for XPA (9/02)	χΦΑ	03/03/06	Overweter - Activities	N/A	l N/A	N/A	No known current eources (spills reported to OERS)	name		N/A	N/A	N/A	NIA	N/A	NIA	H/A	NIA	H/A	N/A
V	Subtrace Plump	1235	10 4 W	2800 NW Fron	Mars Pugt	PH Agr for XPA (9/02)	ХРА	covcoves	Other	N/A	N/A	N/A	N/A	none		N/A	N/A	NÁ	N/A	N/A	N/A .	N/A	N/A	N/A	N/A
13	Port of Portland Terminal 1 North	3377	10 8 W	2200 NW From	Tom Gelner	PH Agr for RI/SCM	Ri	03/06/06	Overland Transport/Sheet Flow	N/A	N/A	NA	N/A	none	to be determined	N/A	N/A	N/A	N/A	N/A	N/A	N/A	NIA	N/A	N/A
	Port of Portand Terminal 1 North	3377	10 8 W	2200 NW From	Torn Galner	PH Age for RUSCAI	RI	03/06/06	Bank Erosion	N/A	N/A	N/A	, N/A	pone		NIA	N/A	N/A	N/A	N/A	N/A	. N/A	N/A	N/A	N/A
	Port of Portland Terminal 1 North	3377	10 S W	2200 NW Fron	Yom Quebrer	PH Agr for RVSCM	Ri	03/06/06	Groundweter	Ongoing	Complete GW Monitoring and evaluation	Complete RVBRA in Summer 2006	Walting on SCE to be completed	to be determined		Walting on SCE to be completed; 2006		_							
	Port of Portand Terminal 1 North	3377	10.5 ¥	2230 NW From	Tom Gainer	PH Agr for RI/8CM	RI	03/06/06	Stormwicze	Completed			insignificent pathway; no actions recommended	Lone		Watting on SCE to be completed; 2005									
	Port of Portland Terminal 1 North	3377	10 S W	v 2200 NW From	Yom Gainer	PH Agr for RI/SCM	RI	03/06/08	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A ·	N/A	NA	N/A	N/A	M/A	N/A	N/A	N/A	N/A
	Port of Portland Terminal 1 North	3377	10.6 Y	y 2200 NW From	forn Gainer	PH Agr for RI/SCM	Ri	03/06/06	Other	N/A .	N/A	N/A	N/A	Voue ,		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	WA	N/A

Shading indicates that uptend source control work has been completed

Conf	Confirmed or suspected SOUICOS of contamination to the river Site information									Source C	ontrol Eva	luation (S	CE)			•	e Control (	Decisions	(SCDs) an	d Status of	Source Con	trol Me	asures (	SCMs)
	Site	inform	ation		L											status								
São nemo	ECSI #	River mile	Address	DEQ PM	Type or agreement directing source	Project status	medited (m-d-y)	conteminani migratian	Status of SCE	Major SCE tasks to be completed	Schedule for completing SCII	Basis for determin	stion thei nours needed	e control is	review of SCE decision	source control sitemetives evaluation . and schedule (m-v)	Selected SCMs	review of SCRI review of SCRI selection decision	completed to date	conteminants conteminants	activities to be done and achedule (m-v)	completed	review of completed SCM	me intenance reculrements
												Patheray determination	Patheny priority level	Site priority level										
Ministration (Albert March 1976) (Albert March 1976) Portland 7 (8) (1984) (1984) (1984)				3								radicality and posturery The actions Transcription and actions Transcription and actions Transcription and actions Transcription and actions Transcription and actions The actions are actions and actions are actions and actions are actions and actions are actions are actions are actions are actions are actions are actions as a construction and actions are actions are actions as a construction and actions are actions as a construction action and actions are actions as a construction action and actions are actions as a construction action and actions are actions as a construction and actions are actions as a construction and actions are actions as a construction action actions are actions as a construction action actions are actions as a construction action actions are actions as a construction action actions are actions as a construction action actions are actions as a construction action actions are actionated actions as a construction action actions are actions as a construction action actions are actions as a construction action actions are actions as a construction action actions are actions as a construction action actions actions actions acti			EPA did not review 6000 pince silo see outsion PHI		Soil removal me remagament plan buring development based restrictions						EPA del ra Como SCO Como PH	
Phone scape (ata Port of Portland 1.15)	NA A	THUM: H			(08/08/03)	I DZDOJA	PARTERS VINCEN				TARBONG HEER D	malgraft and pathway figins actions () the instantant and			EPA district review SCO arrice sits uses contains PH								E-Adding RES RES RES RES RES RES RES RES RES RES	
Riversorpe (als Por of Portend 718) (1986) 118	Bing	# 0 P			(05/06/03)	hnait	MUNCHI					relation parent			EPA did ros levies SCO atrice sta sen dicinate PH		20 80						EPA de no review SCD rocessos PH	
Remarks Remarks (also Port of prisond 115) Removities				<b>HANDLY</b>	(08/06/09) (C	NAME OF THE PERSON OF THE PERS						reignificant payment in actions if			EPA did not present SCD almos allo suas custos PH								PA del nos corisso BCO dros ello visa cutatos PH	
An (Piss P) River scape (skin Post of ordered 7 (5) (11) 1 (11)					1027A	07-0100 07-0100 07-0000 07-0000						Major actions in			EPA did not review BCD; sinta with wear incoming PH 1					7			EPA did not neview BCD drice ofte was Outside PA	
PORTE THE ROGERAL APPROPRIES (IRLA PORT OF PORTE T, 18)	<b>1</b>	1000112			PD PA	9200	8											es l		201				

JSCS	Milestone Report
7.4.1	1D Potential Sources [Tables 1,2,43] partial list
	- Status [Table 4, columns 7, 8, 9, 10, 11/12]
7,4,2	Table of confirmed sources [Table 4]
	-basis for determination: [Wlumn 13]
	- priority of the site [Column 15]
7.4.3	Source Control Decision [Table 4]
	-Summary of SCE
	-basis for SCE [columns 13,14,15]
	-summary of control meaures [column 18]
	-schedule for control measure [Columns 20,22,23]
	implementation
7.4.4	Source Control Measure Status
7,45	· · · · · · · · · · · · · · · · · · ·
	- Proposed activities [column 18]
	- Schedule [Column 22]
	-est mass/vol removed/controlled Lcolumn 21]
ı	p=> - EPA review/comment Date [columns 16,19,24]
7.4.	5=> - 08M requirements (Lolumn 25)
7.4.6	Issues [Section 6]
	- proposed resolution
	-schidule
7.4.7	Sc schedule [Table 4]
	-order by Site priority
	-Site name
!	- Priority rank
	- contaminant pathway
	- Status of Sc docs (SCE, SCD, design, impl. Rpt)
	-target dates

# Sites Adjacent to the River

RM 2-3

west

72 Alder Creek Lumber Co., Inc.

East

T2 Port of Portland (T5)

T2 Oregon Steel Mills - Rivergate

JR Simplot

Port Of Portland

Ash Grove Cement Co

Port of Portland (LSD Fort James)

City of Portland (of-53A)

RM 6-7 West US Moonings Gasco (NW Naturals GasCo.) Koppers Industries Inc Walker Siltronics Corp Archema (Atarina) City of Portland (OF 22B, OF-22C) East City of Portland BES WPC Lab Crawford Street Corp. Metro TI McCormick & Boxter City of Portland (OF-49)

	RW 7-8
	West
71	Archema (Atofina)
T3	OS Roofing Products
	GATX Terminals Corp
Π	Port of Portland (Shell)
TI	Kinder Morgan (Shell)
T1	Port of Portland (chevron)
TI	Port of Portland (Tosco)
72	Port of Portland (McCall Oil & Great Western Chen
T2	City of Portland (OF-22)
:	East
T	mc Cormick & Boxter
<u> </u>	Triangle Park University of Portland
	University of Fortland
	City of Portland (0F48)

RM 8-9 West Port of Portland (McCall Oil & Great Western Chemical) Front Ave LIP/Glacier NW Zidell-Tube Forgings Front Ave LLP Shower Transportation Co laveside Industries Gunderson Inc Equilon Enterprises LC Texaco Portland Bulk Dock T4 Texaco Equilon Pipeline 72 City of Portland (OF-19, OF-19A, OF-18) Portland Shipyard (Cascade General Ship Repair) Port of Portland City of Portland (OFS-6) Swan Island Lagoon USCG Portland Station TZ Fred Divine Diving & Savage Co. Port of Portland Freighliner Corp (Parts MFg) T3 City of Portland Island Holdings Inc. Becker Thuking Inc. (hosby & overton Environmental Fibers Intl City of Portland [OFS-1, OFS-2, OFM-3, OFM-2, OFM) RM 9-10

Nest

Gunderson Inc

Iryjon 3rd Generation Corp

Sause Bros Inc

City of Portland

Cindy Williams

Port of Portland (72)

Port of Portland

City of Portland

City of Portland

City of Portland

Port of Portland

Port of Portland

City of Portland

City of Portland

Port of Portland

City of Portland

City of Portland

Port of Portland

City of Portland

Port of Portland Port of Portland (Freightliner) City of Portland (OFS-5)

	KM 10-11
	West
	Port of Portland
	Bingham Willamette Co.
T3	Sulzer Bingham Pumps
73	Sulzer Bingham Pumps Port of Portland (T1)

Coldendale Aluminum

13 Union Facific Pailroad - Albina Yard
Abharove Cement Co.
Port of Portland

Sakrete of Pacific Northwest

Lity of Portland (OFAF)



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue Seattle, WA 98101

Reply To
Attn Of: ECL-115

April 6, 2006

James M. Anderson DEQ Northwest Region Portland Harbor Section 2020 SW Fourth Ave, Suite 400 Portland, OR 97201

RE: Portland Harbor Joint Source Control Strategy Milestone Report – March 2006

Dear Mr. Anderson:

EPA has reviewed the March 2006 Milestone Report for Upland Source Control at the Portland Harbor Superfund Site submitted by DEQ on March 24, 2006. We can construe that DEQ has spent a lot of time and hard work in developing this report and appreciate the effort put into this document. We do, however, have many comments and concerns with the report. We have enclosed several questions and comments regarding the report (Enclosure 1) that we would like to discuss with DEQ. In some cases, we have provided suggested changes and have enclosed an example of those suggested changes (Enclosure 2).

We would like to set a meeting with you to discuss the contents of the enclosures. From our earlier telephone discussion this week, we will be setting that meeting at the April 12, 2006, Portland Harbor TCT meeting. We look forward to meeting with you.

Sincerely,

Kristine Koch

Remedial Project Manager

U.S. Environmental Protection Agency

encls.

# Enclosure 1 EPA Comments on the

#### Portland Harbor Joint Source Control Strategy Milestone Report - March 2006

#### **General**

Comments:

Much of the explanation of how sources are identified is in the JSCS, why

is it rewritten in the Milestone Report?

#### Section 2.0

Comments:

Why is a detailed discussion about when the sources were identified in relation to the NPL listing in this Report? Why is it relevant to reporting on how the JSCS is being implemented? Is there a substantive difference in how the JSCS is being applied to a facility due to the timeframe the source was identified? If so, what is the substantive difference?

Comments:

Section 2.1, page 5 states that the NPL listing "curtailed" the strategy recommendations for potential sources, but in Section 2.2. it is stated that DEQ's site discovery and assessment work continued after the listing. These statements are inconsistent. Again, why is this discussion in the Report if it is not substantively relevant to how the JSCS is being implemented? If it is relevant to how the JSCS is being implemented, please explain.

#### Section 3.0

Comments:

Page 5-6, <u>Direct discharges</u>: Are there any POTW discharges within the ISA? POTWs can be potential sources when industrial users discharge waste water and storm water to the POTW and the pollutants are not regulated adequately.

#### Section 6.0

These comments are tied to Section 7.4.6 of the PH JSCS. "DEQ will identify issues affecting the ability to make source control decisions or completeness determinations, for any step of the source control process (i.e., identification, characterization, and implementation). In addition, DEQ will propose ways to resolve issues and a desired timeframe for resolution."

Comments:

Page 9, <u>Issue 1</u>: Why are these six facilities singled out as needed accelerated schedules for source control work? Are they unwilling to work with DEQ in controlling sources? The milestone report is not clear on why these facilities are an issue for source control; it just states "For a number of different reasons..."

What part of the source control process is there an issue? Is their a particular pathway that is problematic?

# Enclosure 1 EPA Comments on the

#### Portland Harbor Joint Source Control Strategy Milestone Report - March 2006

The resolution was for "...DEQ... to first identify the sites then accelerate their schedule for source control work." This (to first identify) sound like DEQ needs to identify sites with potential sources, which has already been done. If the intent of DEQ was to state that the sites that are not progressing at an acceptable pace need to be identified by DEQ, it was not portrayed in this sentence. The second resolution (accelerate their schedule for source control work) seems to imply that the problem is with DEQ PM's schedule management. Is this true?

Additionally, a timeframe was not provided for resolving this issue other than "DEQ will report on efforts to accelerate source control work at these sites in the next Milestone Report (June 2006)." Does this mean that DEQ plans to resolve this issue for these sites by June 2006?

Suggested changes: DEQ should strike first sentence from the second paragraph.

Provide the issue(s) for each facility in a sub-issue (e.g., Issue 1a: Premier Edible Oil). Briefly state the issue(s) for the site, including the pathway(s) and process(s) that are problematic. Present the proposed resolution(s) for dealing with issue (this may be a process including meetings, letters, orders, schedule modifications, etc.). Finally, DEQ needs to provide a timeframe for resolving the issue with the facility (e.g., June 2006). DEQ should report on the status of each issue in subsequent milestone reports.

Comments:

Page 10, <u>Issue 2</u>: Why is Gasco separated from the facilities in Issue 1? The milestone report is not clear on why the Gasco facility is an issue for source control. This issue/resolution implies that the problem is with DEQ PM's schedule management (second sentence in second paragraph) and the fact that Gasco is still collecting information when they were listed by DEQ as an active site in 1999. Is the problem really with DEQ management or with data collection or something else? There is no timeframe proposed for resolving this issue.

Suggested changes: Briefly state the issue(s) for the site, including the pathway(s) and process(s) that are problematic. Present the proposed resolution(s) for dealing with issue (this may be a process including meetings, letters, orders, schedule modifications, etc.). Finally, DEQ needs to provide a timeframe for resolving the issue with the facility (e.g., June 2006). DEQ should report on the status of each issue in subsequent milestone reports.

#### **Tables**

These comments are tied to Section 7.4.1 of the PH JSCS. "DEQ is evaluating and identifying potential upland sources of contamination to Portland Harbor to determine if further investigation or source control measures are required. DEQ will present a table

# Enclosure 1 EPA Comments on the Portland Harbor Joint Source Control Strategy Milestone Report – March 2006

of potential upland sources identified through upland site discovery activities (see Appendix B for more information) and the status of their review."

Comments:

It appears that Tables 1, 2 and 3 provide the list of sites that are potential upland sources. It is unclear why DEQ chose to provide this information in three tables rather than one, as described in the PH JSCS, other than to point out the timing of discovery. This could have been done in one table. It is also unclear why DEQ did not include all properties adjacent to the Willamette River as potential upland sources for at least the storm water pathway. Did DEQ use the JSCS screening values in prioritizing all identified facilities in all of the tables?

Comments:

<u>Table 1</u>: Why is the information in Table 1 different from Tables 2 and 3? Why aren't Time Oil and ARCO listed in Table 4? The information (project management input and DEQ Follow-Up) in Table 1 is not necessary for the milestone report and some of the information in seems out of date and may misrepresent the upland source.

Comments:

<u>Table 2</u>: Why aren't Alder Creek Lumber, Babcock Land Company, LLC, City of Portland Water Pollution Lab, Columbia Sand & Gravel, Hampton Lumber Sales/CMI NW, Hendren Tow Boats, RK Storage, Santa Fe Pacific Pipeline, and Transloader International (General Construction Company) listed in Table 4?

Comments:

Tables 2 & 3: EPA does not understand DEQ's priority scheme in these tables. Only PA, XPA, and RI are listed as high priority giving the impression that DEQ is still investigating all these sites and has not conducted any source control measures at these sites. It also gives the impression that DEQ has not listed any sites as high priority because high-priority sties are expected to move forward with aggressive source control measures and these sites are still in the investigation phase.

Comments:

Table 4: Why aren't Esco Landfill Sauive Island, Gasco/Siltronic, Koppers Inc., Texaco Product Pipeline, and Vanwater and Rogers listed in Tables 1, 2 or 3? Why are there listings for Gasco, Siltronic, and Gasco/Siltronic? What are the differences between these sites? Facilities in Table 4 have different names than those in Tables 1, 2 or 3, which makes it difficult to compare tables. Information in column 7 does not reflect current status from other information in table. Why is the information in column 6 important for the Milestone Report? The City of Portland outfalls are only storm water conveyance system rather than a site: no need to list other pathways. The City of Portland has many outfalls with different activities and priorities at each one. The table should list each outfall as pathway and then describe SCE/SCD for each one. Why are headings in Table 4 different from the PH JSCS?

# Enclosure 1 EPA Comments on the Portland Harbor Joint Source Control Strategy Milestone Report – March 2006

Comment: Site names in Tables 1, 2 and 3 do not match those in Table 4.

Suggested changes: DEQ should provide one table that is a comprehensive list all sites that have been considered, historically or currently, a potential upland source to the Willamette River, including those sites that DEQ has already determined are not a source through their investigation process. This will show that DEQ has considered all sources of contamination to the Superfund Site. Information in this table should be limited to site identification (e.g., site name [common, legal, and former, as applicable], site address, ESCI #, river mile, etc.) (Tables 2 & 3, columns 1 & 2; Table 4, columns 1, 2, 3 & 4), name of DEQ PM (Table 4, column 5), contamination migration pathways (Table 4, column 9), project status for each pathway (e.g., not started, PA, XPA, RI, completed) (Table 4, column 7), major SCE tasks to be completed for each pathway (Table 4, column 11), and expected SCE completion date (month and year) or completion date if project status is completed (Table 4, column 12?).

These comments are tied to Section 7.4.2 of the PH JSCS. "Preliminary investigation activities at upland sites are designed to determine if a site is an ongoing source of contamination to the river. Sites that are identified as current or potential sources will be characterized and prioritized, and then may require either initiation of source control measures or further evaluation to determine if source control measures are required. DEQ will present a table of confirmed sources of contamination to the river, the basis for that determination, and the priority of the site for source control. High-priority sites will be identified in the initial Milestone Report based on existing site information, and subsequent Milestone Reports will identify any new high-priority sites as new information becomes available. Source control is expected to move forward at high-priority sites without delay."

Comments:

Table 4 did not specifically provide the basis for the determination of confirmed sources; it was included in Column 13 Pathway determination. A confirmed source is one that has a potential or complete contaminant migration pathway to the Willamette River and has contaminants of interest to the Portland Harbor Superfund Site. DEQ only provided whether the pathway was complete, insignificant, or incomplete; there was no information on contaminants. The term 'insignificant' should not need to be used since there is no definition provided. It would be better to provide a basis that contaminants of interest are not a concern (e.g., contaminants within 1 order of magnitude of SLV, contaminants comply with NPDES permit limits, etc.) and rank the pathway as low priority (Table 4, column 14).

Comments:

\*

The JSCS provided that the priority scheme would result from comparing data from each media to the JSCS SLVs and, along with other information

# Enclosure 1 EPA Comments on the Portland Harbor Joint Source Control Strategy Milestone Report – March 2006

known, a high, medium, or low priority would be given to each identified source. High priority sources would be facilities that needed to move to source control action and stop further investigations and assessment. This scheme does not appear to be applied in the Tables.

Suggested changes: DEQ should provide one table that is a comprehensive list all sites that have been identified as a confirmed upland source to the Willamette River. This table should include the site name (same name as used in potential upland sources table), basis for the determination that this is a confirmed source (e.g., storm water - complete pathway for copper, phthalates, and PCBs), and site priority (Table 4, column 15). DEQ may include this information in the same table as the potential upland sources. Additionally DEQ may provide the determination for why a particular pathway is not a confirmed source (e.g., Overland transport/sheet flow - incomplete pathway: berm prevents overland pathway) and priority level for each pathway (Table 4, column 14).

These comments are tied to Section 7.4.3 of the PH JSCS. "Source control decisions conducted at upland sites will [be] briefly summarized. The Milestone Reports will include a summary of the source control evaluation, the basis for determination that upland source control measures are necessary, a summary of the selected source control measure, and a schedule for implementation of the source control measure. DEQ will present a table of the source control decisions for each contaminant migration pathway for confirmed or potential sources of contamination to the river."

Comments:

 $\mathscr{X}$ 

A summary of the source control evaluation was not provided other than the source was complete, insignificant, or incomplete. This is not enough information about the source control evaluation to identify a confirmed source (See comments for Section 7.4.2.). The basis for upland source control measures was not adequately provided in Table 4 (columns 13, 14 and 15). Examples of adequate basis would be: contaminants 2 or more order(s) of magnitude above SLV; contaminants exceed NPDES permit limits; etc. Not all SCMs are provided in Table 4, column 18 (e.g., Paving at Calbag Metals for storm water). A schedule for implementation of each SCM is not provided in Table 4: column 20 provides the completion date (month, year) for each SCM, although not all entries provide a date: column 22 provides a schedule for SCM, although only limited or no schedule information is provided (a schedule consists of more than just a SCM due date – See additional comments on Section 7.4.4); and column 23 provides the date SCM is complete, which is the same information provided in column 20. The columns in Table 4 do not progress in logical order in the source control process which makes it difficult to determine where DEQ is in the source control process.

# Enclosure 1 EPA Comments on the

#### Portland Harbor Joint Source Control Strategy Milestone Report - March 2006

Comments:

Section 9.0, page 15, second paragraph, indicates that sites that have completed upland source control are shaded. These sites were all given priority of low or medium. Why did DEQ chose to proceed on these sites when there are other high-priority sites that are still being evaluated? If these sites were high priority for source control and are now low priority because of DEQ source control efforts, then they should be identified as high priority sites, but DEQ could add another column for post-SCD site priority where they can indicate that the site is now low priority. For some pathways at some sites, DEQ indicated "no SCM necessary" in Table 4, column 18, without providing any explanation for this. Why do some entries have "N/A" and others state "no SCM necessary?" What is the difference?

Suggested changes: Make suggested changes for Section 7.4.2. Include list of contaminants evaluated and basis for upland source control measures.

Make sure <u>all</u> SCMs implemented for each pathway at each site are included in Table 4, column 18. Be consistent in entering information. Provide a schedule with milestones (proposed activities and estimated completion dates) for all SCMs, including those that have been completed. DEQ should add a column for SCD where it is indicated either "SCM needed" or "no SCM needed." Table should progress in order of source control process.

These comments are tied to Section 7.4.4 of the PH JSCS. "For ongoing source control measures, a summary of their status will be provided in the Milestone Reports. The status report will summarize activities completed to date, proposed activities, and a target schedule for completion. To the extent practical, DEQ will collect information and/or make estimates of the mass or volume of contaminants removed, contained, treated or otherwise controlled, in order to help communicate to stakeholders on the progress of source control activities."

Comments:

See comments for Section 7.4.3 regarding SCM schedule. Why hasn't DEQ provided mass or volume of contaminants removed, contained, treated or otherwise controlled when SCM complete? To help in evaluating whether the source control being taken will be effective or consistent with the Harbor cleanup, the performance standards, e.g., cleanup levels, that DEQ set in each media needs to be provided for each completed source control measure.

Suggested changes: Make suggested changes for Section 7.4.3. Provide mass or volume of contaminants removed, contained, treated or otherwise controlled for completed SCMs. Include clean-up levels for completed activities.

These comments are tied to Section 7.4.5 of the PH JSCS. "A summary of complete source control measures will be provided in the Milestone Reports. The status report

# Enclosure 1 EPA Comments on the

#### Portland Harbor Joint Source Control Strategy Milestone Report - March 2006

will provide a description of the source control measure, the date the source control measures was complete, the date of EPA review and comment, and any operation and maintenance requirements."

Comments:

See comments for Sections 7.4.3 and 7.4.4 regarding completed source control measures. DEQ has provided three places for EPA review and comment in the process: (1) review of SCE; (2) review of SCM selection; and (3) review of completed SCM. Make sure that the data in these columns is correct (e.g., there are places where the information for SCE review is in the SCM evaluation column). Information in these columns can be minimized (e.g., waiting on SCE, submitted 10/2004 no comments received, submitted 10/2004 comments received 11/2004, etc.)

These comments are tied to Section 7.4.7 of the PH JSCS. "DEQ will provide the source control schedule and quarterly updates to the schedule (See Section 6.0) in order of site priority. The schedule will list the site name, priority, known contaminant migration pathways, status of source control documents (i.e., Source Control Evaluation, Source Control Decision, Source Control Design; and Implementation Report). Target dates that have changes will be listed and an explanation for the change will be reported."

Comments:

See comments for Sections 7.4.1 through 7.4.5. Why didn't DEQ put these in order of site priority? Is Table 4, column 17 (Source control alternative evaluation and schedule) the same as Source Control Design? Why isn't there a column for the Implementation Report? Will EPA get to review this document as allowed in the PH JSCS Section 7.3? Is this the purpose for Table 4, column 24?

Suggested changes: The facilities should be listed by priority so that all high priority facilities would be listed first (maybe in a different color), medium second, and low last. The headings in the table should match those in the PH JSCS.

#### Enclosùre 2 Example Milestone Report Table 1. Source Control Evaluation/Decision

		Site identifi	cation			<del></del>	Source Control Evaluat	Jon				Source Control De	cision		
Site Name	ESCI #	River Mile	Address	DEQ PM	Potential Contaminant Migration Pathway	Project Status	Major SCE Tasks	Contaminants Evaluated	SCE Completion Date (m-y)	Confirmed Source (y/n)	Basis for Confirmed Source	Need Source Control (y/n)	Pathway Priority	Site Priority	EPA Review Status
Company A	1234	0.0	123 Location Way	Mr. Clean	Overland Transport/ Sheet Flow	completed			March 2005	no	incomplete pathway; berm prevents overland transport	no	NS	TBD	Waiting on SCE
			,		Bank Erosion	completed			March 2005	no	incomplete pathway; concrete bulkhead along shoreline	no	NS		
					Groundwater	L	Conduct well monitoring; review SCE	DDD, DDE, DDT	June 2006						
	•				Storm Water	not started	Characterization of conveyance system; develop monitoring plan; catch basin/in-ine clean out; sample removed solids; in-line monitoring; review SCE	Cu, Pb, Zn, TPH, phthalates, SVOCs	June 2006				·		
		i			Overwater Activities	completed			March 2005	no	incomplete pathway; no overwater activities at site	no	NS		
					Other	completed			March 2005	no	incomplete pathway; no other pathways identified at site	no ,	NS		
Company B	4321	0.0	234 Location Way	Mr. Clean	Overland Transport/ Sheet Flow	completed		·	March 2005	no	incomplete pathway; all surface routed to storm water conveyance system	no	NS	High	Submitted 7/2005; no comments rec'd
				<u> </u>	Bank Erosion	completed			March 2005	no	incomplete pathway, concrete buildhead along shoreline	no	NS		_
					Groundwater	completed		TPH, PAHs, PCBs, chlorinated pesticides	June 2005	yes	complete pethway; NAPL plume	yes	High		
					Storm Water	completed		Cu, Zn, phthalates, PCBs	June 2005	yes	complete pathway: outfall 1-Cu, phthalates, outfall 2- PCBs	yes	Medium		
			,		Overwater Activities	completed			March 2005	no	incomplete pathway; no overwater activities at site	no	NS		
					Other	completed			March 2005	no	incomplete pathway; no other pathways identified at site	no	NS		

# Enclosure 2 Example Milestone Report Table 2. Source Control implementation

		Site id	dentification			Source Control Implementation													
Site Name	ESCI#	River Mile	Address	DEQ PM	Site Priority	Contaminant Migration Pathway	Contaminants of Concern	Clean-up Levels	Selected SCMs	Completed SCM(s) (m-y)	Mass/Volume Removed/Controlled	O & M Requirements	EPA Review Status						
Company B	4321	0.0	234 Location Way	Mr. Clean	High	Groundwater	TCE	TCE = 0.005 ppm	Pump & Treat										
						·		, ,	Install Sheet Pile Wall	March 2006	500 gallons,								
	,					Storm Water	Cu, PCBs	Cu = 10 ppm PCBs = 0.7 ppm phthalates = 0.8 ppm	Clean out system	October 2005	•	Inspect and monitor conveyance system annually; Clean out system at least every 5 years	Submitted 01/2006; rec'd comments 02/2006						
					-				install Berms	October 2005	,	Inspect monthly during storm season; Clean area regularly to remove debris	rec'd comments						

# Enclosure 2 Example Milestone Report Table 3. Source Control Schedule

		Gite t	iontification			1						Source Co	introl Schedule						
									Sou	rce Control Evalu	urtion		Source	Source Control Implementation					
Site Name	FRCIA	River Mile	Address	DEQ PM	Site Priority	Contaminant Migration	PA	XPA	RI	6CE Report	DEQ Review	DEQ SCD	EPA Review	SCMs Alternatives Evaluation	DEQ Select 6CMs	EPA Review	Complete SCM(s)	DEQ Report	EPA Review
		L			РТЮТКУ	Pathway	(m-y)	(m-y)	(m-y)	(m-y)	(m-y)	(m-y)	(m-y)	(m-y)	(m-y)	(m-y)	(m-y)	(m-y)	(m-y)
Сопрапу В	4321	0.0	234 Location Way	Mr. Clean	High	Overland Transport/ Sheet	August 2004			November 2004	December 2004	March 2005			T				
	ļ			<b></b>		Flow		li		1			July 2005		<del></del>				I
	<u> </u>				Ì	Bank Erosion	August 2004			November 2004	December 2004	March 2005	July 2005		<u> </u>		l1	<u>.</u>	
	L	<u> </u>				Groundwater	August 2004	November 2004		February 2005	March 2005	June 2005	July 2005	November 2005	December 2005	January 2006	April 2007	July 2007	August 2007
	l	<u> </u>				Storm Water	August 2004	November 2004		February 2005	March 2005	June 2005	July 2005	August 2005	August 2005	September 2005	October 2005	December 2005	January 2008
		I				Overwater Activities	August 2004			November 2004	December 2004	March 2005	July 2005						
	!	<u> </u>			I	Other	August 2004			November 2004	December 2004	March 2005	July 2005						
Company A	1234	0.0	123 Location Way	Mr. Clean	TBD	Overland Transport/ Sheet	August 2004			November 2004	December 2004	March 2005	July 2008					_	
		J	· · · · · · · · · · · · · · · · · · ·	i	1	Flow		! !		ľ	1				<u> </u>	i	il		
				1		Bank Erosion	August 2004			November 2004	December 2004	March 2005	July 2006						
	·	l				Groundwater .	August 2004	November 2005		February 2008	March 2008	June 2008	July 2006	October 2006	November 2008	December 2006	December 2007	March 2008	April 2008
						Storm Water	August 2004	November 2005		February 2008	March 2006	June 2008	July 2006	October 2008	November 2006	December 2006	May 2007	August 2007	September 2007
	<u> </u>	<b></b>				Overwater Activities	August 2004			November 2004	December 2004	March 2005	July 2008				i		
	!					Other	August 2004			November 2004	December 2004	March 2005	July 2006						

= Shading indicates that upland source control work has been complete

Confir				urces	of contaminat	tion to the	river	j		Source Co	ontrol Eva	aluation (S	CE)		Dunin at		ce Control	Decisions	(SCDs) and	d Status of	Source Con	trol Me	easures (	SCMs)
ite name		River	mation Address	DEQ PM	Type of agreement	Project	Date last modified	Potential contaminant	Status of	Major SCE tasks to be	Schedule for	Basis for determin	ation that sour	ce control is	Project Status of EPA review of SCE	Status Source control alternatives evaluation	Selected SCMs	Status of EPA review of SCM	SCM activities completed to date	Mass or volume of contaminants	Proposed SCM activities to be done	Date SCM completed	Status of EPA	Operaton and maintenance
inte manie	E031#	mile	Address	DEWFIN	directina source	status	(m-d-v)	migration	SCE	completed	completing SCE	Pathway	Pathway	Site priority	decision	and schedule (m-v)	Selected Soms	selection decision	(m-v)	controlled	and schedule (m-v)	(m-v)	completed SCM	requirements
erminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	ХРА	03/02/06	Overland Transport/Sheet Flow	Completed			determination Insignificant pathway; no actions recommended	priority level	to be determined	Waiting on SCE to be completed. 2006									<del> </del>
erminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	ХРА	03/02/06	Bank Erosion	Completed			Insignificant pathway; no actions recommended	Low		Waiting on SCE to be completed. 2006	<u> </u>		1		<u>-</u>		<u> </u>		-
erminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	XPA	03/02/06	Groundwater	Ongoing	Coordinate with Oregon Steel Mills monitoring	2006	Waiting on SCE to be completed.	to be determined		Waiting on SCE to be completed. 2006									
eminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	XPA	03/02/06	Stormwater	Ongoing		2006	Waiting on SCE to be completed	to be determined		Waiting on SCE to be completed. 2006				7					****
erminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	ХРА	03/02/06	Overwater Activities	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
eminal 5	1686	1.5 E	15540, 15550, & 15560 N Lombard	Tom Gainer	IGA	XPA	03/02/06	Other	N/A	N/A	· N/A	N/A	none		N/A	N/A	N/A	<b>N</b> /A	N/A	N/A	N/A	N/A	N/A	N/A
egon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	no pathway; berm prevents overland transport/sheet flow	None	p High	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
egon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Bank Erosion	Ongoing	Interpretation of sampling data	April 2006	Pathway is complete	p High		Waiting on SCE to be completed. 2006									
egon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Groundwater (UST & AST AQCs)	Completed			Insignificant pathway; no actions recommended	Low		SCE submitted to EPA 10/2004; no comments received		Soil removal completed at time of spill, prior to SCE						SCE submitted to EPA 10/2004; no comments received	
egon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RVSCM (6/00)	Ri	03/15/06	Groundwater (other AOCs)	Ongoing -	Interpretation of sampling data	December 2006	to be determined	to be determined		Waiting on SCE to be completed	ue :								
egon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Stormwater	Ongoing	Further investigation of stormsewer system	December 2006	Pathway is complete	p High	] 	Waiting on SCE to be completed. 2006									
egon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	Rt	03/15/06	Overwater Activities	N/A	N/A	N/A	No known current sources (spills reported to OERS)	none	]	· N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
egon Steel Mills	141	2.2 E	14400 N Rivergate	Heidi Blischke	PH Agr for RI/SCM (6/00)	RI	03/15/06	Other - current NPDES permitted discharge	Not Started	To be determined	No current schedule	Waiting on SCE to be completed			Waiting on SCE to be completed									
co Landfill uive Island	4409	2.6	14444 NW Gillihan Loop	Mark Reeves	Industrial landfill disposal permit	PA	03/20/06	Overland Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	to be determined		N/A	N/A	N/A	N/A	N/A	N/A	N/A	· N/A	N/A
∞ Landfill uive Island	4409	2.6	14444 NW Gillihan Loop	No PM Assigned	Industrial landfill disposal permit	PA	03/20/06	Bank Erosion	N/A	N/A ·	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
co Landfill uive Island	4409	2.6	14444 NW Gillihan Loop	Assigned	Industrial landfill disposal permit	PA	03/20/06	Groundwater	Ongoing	groundwater monitoring ongoing	2007	Waiting on SCE to be completed	to be determined		Waiting on SCE completion, 2007					<u></u>				
uive island	4409	2.6	14444 NW Gillihan Loop	Assigned	Industrial landfill disposal permit	PA	03/20/06	Stormwater	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A -	N/A	N/A	N/A
- Island	4409	2.6	14444 NW Gillihan Loop	<del> </del>	Industrial landfill disposal permit	PA	03/20/06	Overwater Activities	N/A	N/A	N/A ·	. N/A	лопе			N/A	N/A	N/A	N/A	N/A	N/A .	N/A	N/A	N/A
uive island	4409	2.6	14444 NW Gillihan Loop	<del> </del>	Industrial landfill disposal permit	PA	03/20/06	Other Overland	N/A	N/A	N/A	N/A	none			N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Metco	3295	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	APA	03/06/06	Transport/Sheet Flow	N/A	N/A	N/A	N/A	none	PLow	N/A	N/A .	. N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
nsolidated Metco	3295	2.8 E	3940 N Rivergate	Mike Romero	PH Letter Agr for XPA	XPA	03/06/06	Bank Erosion	N/A	N/A	N/A	N/A	none		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A

#### **DEQ Source Control Milestone Report Objectives**

- Site discovery summary and strategy
- Establish a schedule for source control milestones
  - ➤ Determination of whether an upland site is a current source of contamination to the river and sediments
  - > Selection of source control measure
  - ➤ Determination that a source control measure has been satisfactorily performed.
- Track progress of upland source control
- Key information
  - > Source identification
  - > ID site priority (e.g., high priority sites)
  - > Source control measures implemented
  - > Status of ongoing source control measures
  - > Completed source control measures
  - Source reduction estimates
- Source Control Decisions
  - ➤ Table identifying source control decisions for each contaminant pathway at each individual site.
  - > Schedule for implementation
- Status of Ongoing Source Control Measures
  - > Activities completed to date
  - > Proposed activities
  - > Schedule for implementation
- Completed Source Control Measures
  - > Summary of completed measures
  - > Date measure was completed
  - > Date of EPA review and comment
  - > ID operation and maintenance requirements